

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Case. 2:22-cv-01218-RJC

In re: U LOCK INC.,

Debtor-Appellant

On Appeal from the United States Bankruptcy Court for the Western District of Pennsylvania, Hon. Gregory L. Taddonio, Chief United States Bankruptcy Judge, from the Order of August 10, 2022, Denying the Motion to Convert from Chapter 7 to 11 (Entry 110 in Case 22-20823)

APPENDIX FOR APPELLANT U LOCK INC.

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05/10/2022	10 (5 pgs; 4 docs)	BNC PDF Notice - Documents were sent through the BNC to Shanni Snyder (Attachments: # 1 Instructions to Petitioner # 2 Order Designating Officer) (aala) (Entered: 05/10/2022)
05/12/2022	11 (2 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 9 Order Designating Principal Operating Officer/General Partner). Notice Date 05/12/2022. (Admin.) (Entered: 05/13/2022)
05/12/2022	12 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 10 BNC PDF Notice). Notice Date 05/12/2022. (Admin.) (Entered: 05/13/2022)
05/20/2022	14 (211 pgs; 16 docs)	Expedited Motion to Dismiss Case , in addition to Motion For Sanctions <i>Against Petitioning Creditor</i> , or in the alternative Motion for Relief from Stay. Fee Amount \$188., or in the alternative Motion to Abandon <i>the Movant's Property</i> . Fee Amount \$ 188., in addition to Motion to Expedite Hearing Filed by Creditor Christine Biros. (Attachments: # 1 Proposed Order # 2 Exhibit A # 3 Exhibit B # 4 Exhibit C # 5 Exhibit D # 6 Exhibit E # 7 Exhibit F # 8 Exhibit G # 9 Exhibit H # 10 Exhibit I # 11 Exhibit J # 12 Exhibit K # 13 Exhibit L # 14 Exhibit M # 15 Exhibit N) (Wenrich, Sarah) (Entered: 05/20/2022)
05/20/2022	15	Receipt of Motion for Relief From Stay(22-20823-GLT) [motion,mrlfsty] (188.00) filing fee. Receipt number A15927869, amount \$ 188.00. (U.S. Treasury) (Entered: 05/20/2022)
05/20/2022	16	Receipt of Motion to Abandon(22-20823-GLT) [motion,mabn] (188.00) filing fee. Receipt number A15927869, amount \$ 188.00. (U.S. Treasury) (Entered: 05/20/2022)
05/20/2022	17 (2 pgs; 2 docs)	Order Setting Hearing on (RE: related document(s): 14 Motion to Dismiss Case filed by Creditor Christine Biros, Motion for Sanctions, Motion for Relief From Stay, Motion to Abandon, Motion to Expedite Hearing). Hearing scheduled for 6/2/2022 at 09:00 AM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. Responses due by 5/31/2022 by 12 PM. (jhel) (Entered: 05/20/2022)
05/20/2022	18 (47 pgs; 2 docs)	Exhibit <i>I (Amended)</i> Filed by Creditor Christine Biros (RE: related document(s): 14 Motion to Dismiss Case filed by Creditor Christine Biros, Motion for Sanctions, Motion for Relief From Stay, Motion to Abandon, Motion to Expedite Hearing, 17 Order Scheduling a Hearing). (Attachments: # 1 Amended Exhibit I - Transcript) (Wenrich, Sarah) (Entered: 05/20/2022)
05/20/2022	19 (2 pgs)	Certificate of Service Regarding the Hearing on 6/2/2022. Filed by Creditor Christine Biros (RE: related document(s): 14 Motion to Dismiss Case filed by Creditor Christine Biros, Motion for Sanctions, Motion for Relief From Stay, Motion to Abandon, Motion to Expedite Hearing, 17 Order Scheduling a Hearing, 18 Exhibit filed by Creditor Christine Biros). (Wenrich, Sarah) (Entered: 05/20/2022)
05/27/2022	20 (6 pgs)	Summons Service Executed in an Involuntary Case on George Snyder. Service Executed on: 5/23/2022, Answer Due on: 6/13/2022. Add 3 days to the answer due date if service was made through the

		Christine Biros # 2 Certificate of Service) (Roth, J.) (Entered: 06/03/2022)
06/03/2022	29 (8 pgs; 3 docs)	Response <i>TO NOTICE OF PARTIAL NON-OBJECTION TO LIMITED RELIEF FROM THE STAY</i> Regarding the Hearing on no hearing date scheduled. Filed by Christine Biros (RE: related document(s): 14 Motion to Dismiss Case filed by Creditor Christine Biros, Motion for Sanctions, Motion for Relief From Stay, Motion to Abandon, Motion to Expedite Hearing, 22 Response filed by Debtor U LOCK INC, 28 Notice filed by Debtor U LOCK INC). (Attachments: # 1 Exhibit A - Proposed Order # 2 Certificate of Service) (Wenrich, Sarah) (Entered: 06/03/2022)
06/03/2022	30	TEXT ORDER: On June 2, 2022, the Court held a hearing on the Expedited Motion to Dismiss Case, in addition to Motion for Sanctions Against Petitioning Creditor, or in the alternative Motion for Relief from Stay, or in the alternative Motion to Abandon the Movant's Property [Dkt. No. 14]. Based upon statements made on the record at the June 2 hearing, it is hereby ORDERED that the Expedited Motion to Dismiss Case, in addition to Motion for Sanctions Against Petitioning Creditor, or in the alternative Motion for Relief from Stay or in the alternative Motion to Abandon the Movant's Property [Dkt. No. 14] is CONTINUED to July 6, 2022 at 11 a.m. Judge Taddonio Signed on 6/3/2022. (RE: related document(s): 14 Motion to Dismiss Case filed by Creditor Christine Biros, Motion for Sanctions, Motion for Relief From Stay, Motion to Abandon, Motion to Expedite Hearing). Hearing scheduled for 7/6/2022 at 11:00 AM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. (hthu) (Entered: 06/03/2022)
06/03/2022	31	TEXT ORDER: On June 2, 2022, the Court held a hearing on the Expedited Motion to Dismiss Case, in addition to Motion for Sanctions Against Petitioning Creditor, or in the alternative Motion for Relief from Stay, or in the alternative Motion to Abandon the Movant's Property [Dkt. No. 14]. Based upon statements made on the record at the June 2 hearing, it is hereby ORDERED that On or before June 3, 2022 at 4 p.m., the parties shall file, under certification of counsel, an order granting limited stay relief to Christine Biros for the purpose of initiating environmental remediation. (RE: related document(s): 14 Motion to Dismiss Case, Motion for Sanctions, Motion for Relief From Stay, Motion to Abandon, Motion to Expedite Hearing). (hthu) (Entered: 06/03/2022)
06/03/2022	32 (3 pgs; 2 docs)	Reply to the Response to the Statement of Non-Objection Regarding the Hearing on under advisement. Filed by U LOCK INC (RE: related document(s): 29 Response filed by Creditor Christine Biros). (Attachments: # 1 Certificate of Service) (Roth, J.) (Entered: 06/03/2022)
06/03/2022	33 (4 pgs; 2 docs)	Proposed Order RE: (non consent) Limited Relief from Stay Filed by Debtor U LOCK INC (RE: related document(s): 31 Order -Non-motion related-). (Attachments: # 1 Certificate of Service) (Roth, J.) (Entered: 06/03/2022)
06/03/2022	34 (3 pgs)	Hearing Held on 6/2/2022 (RE: related document(s): 14 Motion to Dismiss Case filed by Creditor Christine Biros, Motion for Sanctions, Motion for Relief From Stay, Motion to Abandon, Motion

		to Expedite Hearing). 1. [Text Order] 2. [Text Order] (aala) (Entered: 06/03/2022)
06/03/2022	35 (1 pg)	3-Day Transcript Requested by Christine Biros regarding hearing held 06/02/2022. Transcript is being prepared by J&J Court Transcribers, Inc. Estimated completion date is 06/08/2022. (RE: related document(s): 34 Hearing Held). (hsmi) (Entered: 06/03/2022)
06/03/2022	36 (7 pgs; 2 docs)	Order Granting Christine Biros Limited Relief from the Stay. Signed on 6/3/2022. (RE: related document(s): 14 Motion to Dismiss Case, Motion for Sanctions, Motion for Relief From Stay, Motion to Abandon, Motion to Expedite Hearing, 22 Response, 28 Notice). (hthu) (Entered: 06/03/2022)
06/05/2022	37 (7 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 36 Order -Non-motion related-). Notice Date 06/05/2022. (Admin.) (Entered: 06/06/2022)
06/08/2022	38 (38 pgs)	Transcript regarding Hearing Held 06/02/2022. The transcript may be viewed at the Bankruptcy Court Clerk's Office. For information about how to contact the transcriber, call the Clerk's Office or contact the Court Reporter/Transcriber J&J Court Transcribers, Inc., Telephone number 609-586-2311. (RE: related document(s) 35 Transcript Request). Notice of Intent to Request Redaction due 6/15/2022. Redaction Request due 6/29/2022. Redacted Transcript Submission due 7/11/2022. Remote electronic access to the transcript is restricted through 9/6/2022. (hsmi) (Entered: 06/08/2022)
06/08/2022	39 (3 pgs; 2 docs)	Notice of Filing of Transcript. Notice is hereby given that a transcript of the hearing held on 06/02/2022 on Expedited Motion to Dismiss Case, in addition to Motion For Sanctions Against Petitioning Creditor, or in the alternative Motion for Relief from Stay Fee Amount, or in the alternative Motion to Abandon the Movants Property filed by Christine Biros; Amended Exhibit I has been filed. Transcripts are available for inspection only at the Clerk's Office or may be purchased from the Court Transcriber during the 90 day restriction period. (RE: related document(s): 38 Transcript). (hsmi) (Entered: 06/08/2022)
06/10/2022	40 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 39 Notice of Filing of Transcript). Notice Date 06/10/2022. (Admin.) (Entered: 06/11/2022)
06/17/2022	41 (2 pgs; 2 docs)	Notice of Appointment of Trustee. (aala) (Entered: 06/17/2022)
06/17/2022	42 (2 pgs; 2 docs)	Order for Relief Signed on 6/17/2022. Incomplete Filings due by 7/1/2022. Statement of Current Monthly Income FR 122A due by 7/1/2022. List of all Creditors due 6/24/2022. Proofs of Claims due by 8/26/2022. Government Proof of Claim due by 12/14/2022. (aala) Modified on 6/21/2022 (aala). CORRECTIVE ENTRY: THE DEADLINE FOR THE STATEMENT OF CURRENT MONTHLY INCOME FR 122A IS DUE BY 7/5/2022 AND INCOMPLETE FILINGS ARE DUE BY 7/5/2022. THE 7/1/2022 DEADLINE WAS TERMINATED. (Entered: 06/17/2022)

06/17/2022	43 (2 pgs; 2 docs)	ORDER AND NOTICE REGARDING INVOLUNTARY CHAPTER 7 PETITION. Signed on 6/17/2022. (RE: related document(s): 1 Involuntary Petition Chapter 7). IT IS FURTHER ORDERED that if the documents are not filed pursuant to this Order by July 5, 2022, a Rule to Show Cause hearing is to be held on 7/7/2022 at 11:00 AM at p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. cm: All Interested Parties (aala) (Entered: 06/17/2022)
06/19/2022	44 (3 pgs)	BNC Certificate of Mailing. (RE: related document(s): 41 Notice Appointing Trustee). Notice Date 06/19/2022. (Admin.) (Entered: 06/20/2022)
06/19/2022	45 (2 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 42 Order for Relief -Ch.7-). Notice Date 06/19/2022. (Admin.) (Entered: 06/20/2022)
06/21/2022	46	Deadlines Updated (RE: related document(s): 42 Order for Relief - Ch.7-). Statement of Current Monthly Income FR 122A due by 7/5/2022. Incomplete Filings due by 7/5/2022. (aala) (Entered: 06/21/2022)
06/21/2022	47	Corrective Entry: THE DEADLINE FOR THE STATEMENT OF CURRENT MONTHLY INCOME FR 122A IS DUE BY 7/5/2022 AND INCOMPLETE FILINGS ARE DUE BY 7/5/2022. THE 7/1/2022 DEADLINE WAS TERMINATED. (RE: related document(s): 42 Order for Relief -Ch.7-). (aala) (Entered: 06/21/2022)
06/22/2022	48	Rejection of Appointment by the Trustee. I, Charles O. Zebley, Jr., hereby reject the Appointment of Trustee in the above captioned case for the following reason(s) <i>Conflict of Interest</i> . Filed by Charles O. Zebley Jr.. (Zebley, Charles) (Entered: 06/22/2022)
06/22/2022	49 (2 pgs; 2 docs)	Notice of Appointment of Trustee. (aala) (Entered: 06/22/2022)
06/23/2022	50 (2 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 43 Order -Non-motion related-). Notice Date 06/23/2022. (Admin.) (Entered: 06/24/2022)
06/24/2022	51 (3 pgs)	BNC Certificate of Mailing. (RE: related document(s): 49 Notice Appointing Trustee). Notice Date 06/24/2022. (Admin.) (Entered: 06/25/2022)
06/30/2022	52	Text Order Rescheduling Hearing: The Court previously issued an order scheduling a show cause hearing for July 7, 2022 at 11am if the debtor failed to complete the petition by July 5, 2022. The continued hearing on the expedited Motion to Dismiss Case [Dkt. NO. 14] is scheduled for July 6, 2022 at 11 am. Therefore, in an effort to efficiently hear both matters on the same day, it is hereby ORDERED that the in-person Show Cause Hearing scheduled for July 7, 2022 is RESCHEDULED to July 6, 2022 at 11 am in Courtroom A 54th Floor U.S. Steel Tower, 600 Grant St., Pittsburgh, PA. Judge Taddonio signed on 6/30/2022. (RE: related document(s): 43 Order - Non-motion related-, Order to Show Cause). Hearing scheduled for

	(5 pgs)	Debtor U LOCK INC (Roth, J.) (Entered: 07/06/2022)
07/06/2022	64 (1 pg)	Schedule H: Non-Individual- Codebtors to the extent U Lock acted since 2015 in the capacity as a trustee Filed by Debtor U LOCK INC (Roth, J.) (Entered: 07/06/2022)
07/06/2022	65 (19 pgs)	Statement of Financial Affairs Filed by Debtor U LOCK INC (Roth, J.) (Entered: 07/06/2022)
07/06/2022	66 (1 pg)	Declaration re: <i>Under Penalty of Perjury for Non-Individual Debtors</i> Filed by Debtor U LOCK INC (Roth, J.) (Entered: 07/06/2022)
07/06/2022	67 (3 pgs; 2 docs)	Mailing Matrix Filed by Debtor U LOCK INC (Attachments: # 1 Verification of Creditor Matrix) (Roth, J.) (Entered: 07/06/2022)
07/06/2022	68	Text Order re: (58 Hearing on a Judge Taddonio Case Set by Attorney or Trustee). Without further notice or hearing, this pleading will be denied without prejudice if the following action is not taken: THE LOCATION OF THE HEARING MUST BE REFLECTED IN THE DOCKET TEXT. MUST BE REFILED. This text-only entry constitutes the Court's order and notice on this matter. Judge Taddonio Signed on 7/6/2022. (RE: related document(s): 58 Hearing on a Judge Taddonio Case Set by Attorney or Trustee). Required corrective action due on or before 7/14/2022. (aala) (Entered: 07/06/2022)
07/06/2022	69 (3 pgs; 2 docs)	Hearing on MOTION OF U LOCK INC. TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 11 Filed by Debtor U LOCK INC (RE: related document(s): 53 Motion to Convert Case from Chapter 7 to 11 filed by Debtor U LOCK INC). Hearing scheduled for 8/9/2022 at 02:00 PM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. Responses due by 7/19/2022. (Attachments: # 1 Certificate of Service) (Roth, J.) (Entered: 07/06/2022)
07/06/2022	70	Text Order re: (53 Motion to Convert Case from Chapter 7 to 11, 69 Hearing on a Judge Taddonio Case Set by Attorney or Trustee).. Without further notice or hearing, this pleading will be denied without prejudice if the following action is not taken: Counsel shall serve the motion and notice of hearing on all parties listed on the Clerk's office mailing matrix. Counsel shall file amended proof of service in compliance with W.PA.LBR 2002-1 and 5005-6(b). Specifically, the Filing User's name, address, telephone number, email address and state bar registration number should be included in the signature block. This text-only entry constitutes the Court's order and notice on this matter. Judge Taddonio Signed on 7/6/2022. (RE: related document(s): 53 Motion to Convert Case from Chapter 7 to 11, 69 Hearing on a Judge Taddonio Case Set by Attorney or Trustee). Required corrective action due on or before 7/14/2022. (hthu) (Entered: 07/06/2022)
07/06/2022	71 (4 pgs; 2 docs)	Application to Employ Robert H. Slone as Counsel to Chapter 7 Trustee Filed by Trustee Robert H. Slone, Trustee. (Attachments: # 1 Proposed Order) (Slone, Trustee, Robert) (Entered: 07/06/2022)
07/06/2022	72 (3 pgs)	Hearing Held on 7/6/22 (RE: related document(s): 14 Motion to Dismiss Case filed by Creditor Christine Biros, Motion for

Sanctions, Motion for Relief From Stay, Motion to Abandon, Motion to Expedite Hearing). (hthu) (Entered: 07/06/2022)

07/06/2022	73 (2 pgs)	Order denying without prejudice the Expedited Motion [Dkt No.14] to the extent it seeks to dismiss the bankruptcy case. Order continuing hearing on the Expedited Motion [Dkt. No.14] to August 9, 2022 at 2pm to the extent it seeks stay relief. On or before the close of business on July 7, 2022, the Debtor shall file the declaration re: electronic filing. Judge Taddonio Signed on 7/6/2022. (RE: related document(s): 14 Motion to Dismiss Case filed by Creditor Christine Biros, Motion for Sanctions, Motion for Relief From Stay, Motion to Abandon, Motion to Expedite Hearing). Hearing scheduled for 8/9/2022 at 02:00 PM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. Parties may participate in the hearing via Zoom video conference in compliance with Judge Taddonio's Procedures (hthu) (Entered: 07/06/2022)
07/06/2022	74 (2 pgs)	Exhibit A submitted at July 6, 2022 hearing by Debtor U LOCK INC (RE: related document(s): 72 Hearing Held). (hthu) (Entered: 07/06/2022)
07/06/2022	75 (3 pgs)	Amended Certificate of Service Regarding the Hearing on 8/9/2022. Filed by U LOCK INC (RE: related document(s): 53 Motion to Convert Case from Chapter 7 to 11, 69 Hearing on a Judge Taddonio Case Set by Attorney or Trustee, 70 Order Fixing Deadline to Deny a Motion). (Roth, J.) (Entered: 07/06/2022)
07/07/2022	76 (1 pg)	Declaration re: <i>Electronic Filing of Schedules and Statements</i> Filed by Debtor U LOCK INC (Roth, J.) Modified on 7/7/2022 (aala). CORRECTIVE ENTRY: THE DECLARATION OF ELECTRONIC FILING IS NOT TO BE FILED ELECTRONICALLY. THE EIN NUMBER IS REQUIRED ON THE DOCUMENT. MUST BE REFILED THROUGH THE EDSS SYSTEM PER JUDGE TADDONIO'S SIGNED ORDER 7/6/2022 AT DOCUMENT # 73. (Entered: 07/07/2022)
07/07/2022	77	Corrective Entry: THE DECLARATION OF ELECTRONIC FILING IS NOT TO BE FILED ELECTRONICALLY. THE EIN NUMBER IS REQUIRED ON THE DOCUMENT. MUST BE REFILED THROUGH THE EDSS SYSTEM PER JUDGE TADDONIO'S SIGNED ORDER 7/6/2022 AT DOCUMENT # 73. (RE: related document(s): 76 Declaration filed by Debtor U LOCK INC). (aala) (Entered: 07/07/2022)
07/07/2022	78 (2 pgs; 2 docs)	Order Granting Application to Employ Robert H. Slone, Esq. as Counsel for the Chapter 7 Trustee. (Related Doc # 71) Signed on 7/7/2022. (aala) (Entered: 07/07/2022)
07/07/2022	79	Declaration Re: Electronic Filing (aala) (Entered: 07/07/2022)
07/07/2022	80 (3 pgs; 2 docs)	Meeting of Creditors 341(a) meeting to be held on 09/09/2022 at 09:00 AM at 341 telephonic hearing. Proofs of Claims due by 8/26/2022. Government Proof of Claim due by 12/14/2022. (aala) (Entered: 07/07/2022)
07/08/2022	81 (3 pgs)	Certificate of Service for Order Granting Application to Employ Robert H. Slone, Esq. as Counsel for the Chapter 7 Trustee Filed by

		Trustee Robert H. Slone, Trustee (RE: related document(s): 78 Order on Application to Employ). (Slone, Trustee, Robert) (Entered: 07/08/2022)
07/09/2022	82 (5 pgs)	BNC Certificate of Mailing - Meeting of Creditors. (RE: related document(s): 80 Meeting of Creditors Chapter 7 Asset Business/Corporation). Notice Date 07/09/2022. (Admin.) (Entered: 07/10/2022)
07/09/2022	83 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 78 Order on Application to Employ). Notice Date 07/09/2022. (Admin.) (Entered: 07/10/2022)
07/12/2022	84	Trustee's Notice of Assets & Request for Notice to Creditors Filed by Robert H. Slone, Trustee. (Slone, Trustee, Robert) (Entered: 07/12/2022)
07/12/2022	85 (1 pg)	Three-Day Transcript Requested by U LOCK INC regarding hearing held on 07/06/2022. Transcript is being prepared by J&J Court Transcribers, Inc. Estimated completion date is 07/18/2022. (RE: related document(s): 72 Hearing Held). (aolo) (Entered: 07/12/2022)
07/15/2022	86 (11 pgs; 3 docs)	Notice Regarding of Non-Compliance as Directed by Paragraph 12 of the Order at Entry 36. Filed by Debtor U LOCK INC (RE: related document(s): 36 Order -Non-motion related-). (Attachments: # 1 Exhibit Cease and Desist from North Huntingdon Township # 2 Declaration of George Snyder) (Roth, J.) (Entered: 07/15/2022)
07/15/2022	87 (3 pgs; 2 docs)	Certificate of Service of Notice of Non-Compliance Filed by U LOCK INC (RE: related document(s): 86 Notice). (Attachments: # 1 Mailing Matrix of Persons Served)(Roth, J.) (Entered: 07/15/2022)
07/18/2022	88 (49 pgs)	Transcript regarding Hearing Held 07/06/2022. The transcript may be viewed at the Bankruptcy Court Clerk's Office. For information about how to contact the transcriber, call the Clerk's Office or contact the Court Reporter/Transcriber J&J Court Transcribers, Inc., Telephone number 609-586-2311. (RE: related document(s) 85 Transcript Request). Notice of Intent to Request Redaction due 7/25/2022. Redaction Request due 8/8/2022. Redacted Transcript Submission due 8/18/2022. Remote electronic access to the transcript is restricted through 10/17/2022. (hsmi) (Entered: 07/18/2022)
07/18/2022	89 (3 pgs; 2 docs)	Notice of Filing of Transcript. Notice is hereby given that a transcript of the hearing held on 07/06/2022 on Continued Expedited Motion to Dismiss Case, in addition to Motion For Sanctions Against Petitioning Creditor, or in the alternative Motion for Relief from Stay Fee Amount, or in the alternative Motion to Abandon the Movant's Property; Order to Show Cause has been filed. Transcripts are available for inspection only at the Clerk's Office or may be purchased from the Court Transcriber during the 90 day restriction period. (RE: related document(s): 88 Transcript). (hsmi) (Entered: 07/18/2022)
07/18/2022	90 (2 pgs; 2 docs)	This matter is before the Court upon the filing of the Notice Regarding Non-Compliance as Directed by Paragraph 12 of the

Order at Entry 36 [Dkt. No.86] (the Notice) filed by U LOCK INC. It is hereby ORDERED, ADJUDGED AND DECREED that:(1) Any response to the Notice shall be filed on or before July 25, 2022. Order Signed on 7/18/2022. (RE: related document(s): [86](#) Notice). (aala) (Entered: 07/18/2022)

07/19/2022	91 (15 pgs; 5 docs)	Response <i>In Opposition</i> Regarding the Hearing on 08/09/22. Filed by Christine Biros (RE: related document(s): 53 Motion to Convert Case from Chapter 7 to 11 filed by Debtor U LOCK INC). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Certificate of Service # 4 Mailing Matrix) (Wenrich, Sarah) (Entered: 07/19/2022)
07/19/2022	92 (5 pgs; 2 docs)	Response to Motion to Convert Case from Chapter 7 to 11 Regarding the Hearing on 08/09/22. Filed by Robert H. Slone, Trustee (RE: related document(s): 53 Motion to Convert Case from Chapter 7 to 11 filed by Debtor U LOCK INC, 69 Hearing on a Judge Taddonio Case Set by Attorney or Trustee filed by Debtor U LOCK INC). (Attachments: # 1 Proposed Order) (Slone, Trustee, Robert) (Entered: 07/19/2022)
07/20/2022	93 (4 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 89 Notice of Filing of Transcript). Notice Date 07/20/2022. (Admin.) (Entered: 07/21/2022)
07/20/2022	94 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 90 Order -Non-motion related-). Notice Date 07/20/2022. (Admin.) (Entered: 07/21/2022)
07/22/2022	95 (5 pgs; 2 docs)	Motion to Compel William Otto to File Appearance. Filed by Petitioning Creditor Shanni Snyder. (Attachments: # 1 Proposed Order) (mgut) (Entered: 07/22/2022)
07/25/2022	96 (2 pgs)	Response to Debtor U Lock's Notice of Non-Compliance Regarding the Hearing on no hearing date scheduled. Filed by Robert H. Slone, Trustee (RE: related document(s): 86 Notice filed by Debtor U LOCK INC). (Slone, Trustee, Robert) (Entered: 07/25/2022)
07/25/2022	97 (14 pgs; 4 docs)	Response to Debtor U Locks notice of Non-Compliance Regarding the Hearing on 08/09/2022. Filed by Christine Biros (RE: related document(s): 36 Order -Non-motion related-, 86 Notice filed by Debtor U LOCK INC). (Attachments: # 1 Exhibit A # 2 Certificate of Service # 3 Exhibit Creditor's Mail Matrix) (Wenrich, Sarah) (Entered: 07/25/2022)
07/28/2022	98 (2 pgs; 2 docs)	Order Signed on 7/28/2022. ORDERED, ADJUDGED, and DECREED that the Motion will be dismissed on August 5, 2022, without prejudice unless the Movant takes the following corrective action:... (RE: related document(s): 95 Motion to Compel William Otto to file an Appearance). (lfin) (Entered: 07/28/2022)
07/30/2022	99 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 98 Order -Non-motion related-). Notice Date 07/30/2022. (Admin.) (Entered: 07/31/2022)
08/01/2022	104 (438 pgs; 3 docs)	Adversary case 22-2048. Complaint Pursuant to 11 USC 105(a) and 362(k) and by U LOCK INC against Christine Biros. Fee Amount \$ 350. (Attachments: # 1 Exhibit A -- Contract between U Lock and

Biros # 2 Exhibit B -- Decision of Court of Common Pleas # 3 Exhibit C -- Superior Court Opinion # 4 Exhibit D(1) -- State Court Docket Sheet #1 # 5 Exhibit D(2) -- State Court docket sheet pt 2 # 6 Exhibit Superior Court docket sheet # 7 Exhibit F -- Supreme Court of Pennsylvania docket sheet # 8 Exhibit G -- Unilateral Order of January 20 2022 # 9 Exhibit H-- January 25 2022 deed # 10 Exhibit I -- U Lock motion to stay remand of record # 11 Exhibit J -- Biros response to motion to stay # 12 Exhibit K-- March 16 2022 Order of Supreme Court of Pennsylvania # 13 Exhibit L -- U Lock motion to vacate unilateral order # 14 Exhibit M -- April 16 2022 Petition for Writ of Possession (never filed) # 15 Exhibit N -- Motion for Sanctions (never filed) # 16 Exhibit O -- U Lock preliminary objections to petition for possession # 17 Exhibit P -- Transcript of April 22 2022 hearing # 18 Exhibit Q -- May 13 2022 Order Granting Possession and Levy # 19 Exhibit R -- May 13 2022 Order Denying Motion to Vacate Unilateral Order # 20 Exhibit S May 18 2022 Letter from Christine Biros to state judge # 21 Exhibit T -- Transcript May 20 2022 state court hearing # 22 Exhibit U -- May 24 2022 letter from Christine Biros to state judge # 23 Exhibit V -- June 1 2022 letter from Christine Biros to state court judge # 24 Exhibit W -- Letter to state court judge May 5 2022) Nature of Suit: (91 (Declaratory judgment)), (14 (Recovery of money/property - other)) (Roth, J.) (Attachments: # [1](#) Exhibits A-N # [2](#) Exhibits O-W) (dpas) (Attachment 1 replaced on 8/5/2022) (dpas). (Attachment 2 replaced on 8/5/2022) (dpas). (Entered: 08/05/2022)

08/03/2022	100 (6 pgs; 2 docs)	Declaration re: <i>Notice of Non-Compliance (Docket Entry 86)</i> Filed by Debtor U LOCK INC (Attachments: # 1 Certificate of Service) (Roth, J.) (Entered: 08/03/2022)
08/03/2022	101 (5 pgs; 2 docs)	NOTICE OF HEARING AND RESPONSE DEADLINE REGARDING MOTION OF SHANNI SNYDER TO COMPEL WILLIAM OTTO TO FILE APPEARANCE (RE: related document(s): 95 Motion to Compel filed by Petitioning Creditor Shanni Snyder). Hearing scheduled for 9/9/2022 at 11:00 AM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. Responses due by 8/21/2022. Filed by Shanni Snyder (aala) (Entered: 08/03/2022)
08/04/2022	102 (21 pgs; 2 docs)	Exhibit <i>s to be referenced at hearing on August 9, 2022</i> Filed by Debtor U LOCK INC (RE: related document(s): 53 Motion to Convert Case from Chapter 7 to 11 filed by Debtor U LOCK INC). (Attachments: # 1 Certificate of Service) (Roth, J.) (Entered: 08/04/2022)
08/04/2022	103 (2 pgs; 2 docs)	Order Denying Motion To Compel William Otto to File Appearance - The hearing scheduled for September 9, 2022 is CANCELLED. (Related Doc # 95) Signed on 8/4/2022. (aala) (Entered: 08/04/2022)
08/05/2022	105 (14 pgs; 2 docs)	Adversary case 22-02052. Complaint by Shanni Snyder against U LOCK INC. , Biros Irrevocable Life Insurance Trust , Christine Biros , Robert H. Slone , Charles O. Zebley Jr.. Receipt Number NFP, Fee Amount \$ 350 . (Attachments: # 1 Letter) Nature of Suit: (91 (Declaratory judgment)), (21 (Validity, priority or extent of lien or other interest in property)) (aala) (Entered: 08/05/2022)
08/05/2022	106 (6 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 101 Order Scheduling Hearing). Notice Date 08/05/2022. (Admin.) (Entered: 08/06/2022)

08/06/2022	<u>107</u> (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): <u>103</u> Order on Motion to Compel). Notice Date 08/06/2022. (Admin.) (Entered: 08/07/2022)
08/08/2022	<u>108</u> (19 pgs; 3 docs)	DECLARATION OF GEORGE SNYDER IN REFERENCE TO CERTAIN EQUIPMENT Filed by Managing General Partner George Snyder (Attachments: # <u>1</u> Exhibit # <u>2</u> Certificate of Service) (aala) (Entered: 08/08/2022)
08/10/2022	<u>109</u> (2 pgs)	Hearing Held on 8/9/2022 (RE: related document(s): <u>14</u> Motion to Dismiss Case filed by Creditor Christine Biros, Motion for Sanctions, Motion for Relief From Stay, Motion to Abandon, Motion to Expedite Hearing, <u>36</u> Order -Non-motion related-, <u>53</u> Motion to Convert Case from Chapter 7 to 11 filed by Debtor U LOCK INC, <u>102</u> Exhibit filed by Debtor U LOCK INC). (jhel) (Entered: 08/10/2022)
08/10/2022	110	TEXT ORDER: On August 9, 2022, a hearing was conducted on the Motion to Convert Case from Chapter 7 to 11 [Dkt. No. 53] ("Motion"). It is hereby ORDERED, ADJUDGED, and DECREED that the Motion is DENIED for the reasons stated on the record. This text-only entry constitutes the Court's order and notice on this matter. Judge Taddonio Signed on 8/10/2022. (jhel) (Entered: 08/10/2022)
08/10/2022	111	TEXT ORDER: On August 9, 2022, a hearing was conducted on the Notice Regarding Non-Compliance as Directed by Paragraph 12 of the Order at Entry 36 [Dkt. No. 86] ("Notice"). It is hereby ORDERED, ADJUDGED, and DECREED that the Notice is DENIED as WITHDRAWN. This text-only entry constitutes the Court's order and notice on this matter. Judge Taddonio Signed on 8/10/2022. (RE: related document(s): <u>86</u> Notice). (jhel) (Entered: 08/10/2022)
08/10/2022	112	TEXT ORDER: On August 9, 2022, a hearing was conducted on Adversary Proceeding (22-2048-GLT) [Dkt. No. 104] ("Adversary"). It is hereby ORDRED, ADJUDGED, and DECREED, that the Adversary is DISMISSED prejudice for the reasons stated on the record. This text-only entry constitutes the Court's order and notice on this matter. Judge Taddonio Signed on 8/10/2022.. (RE: related document(s): <u>104</u> Entry). (jhel) (Entered: 08/10/2022)
08/10/2022	113	TEXT ORDER: On August 9, 2022, a hearing was conducted on the continued Expedited Motion to Dismiss Case, in addition Motion for Sanctions, Motion to Abandon the Movants Property Against Petitioning Creditor, or in the alternative Motion for Relief from Stay or in the alternative Motion to Abandon the Movants Property ("Motion"). It is hereby ORDRED, ADJUDGED, and DECREED, that: (1) The Motion is CONTINUED to August 25, 2022, at 11:30 a.m. before Judge Gregory L. Taddonio in Courtroom A, 54th Floor U.S. Steel Tower, 600 Grant Street, Pittsburgh, Pennsylvania. (2) On or before August 23, 2022, the Trustee shall file a status report. (3) Parties that wish to participate in the hearing via Zoom video conference shall comply with Judge Taddonio's Procedures. If the parties already have registered for the hearing, there is no need to re-register for this time change. This text-only entry constitutes the Court's order and notice on this matter. Judge Taddonio Signed on 8/10/2022 (RE: related document(s): <u>14</u> Motion to Dismiss Case filed by Creditor Christine Biros, Motion for Sanctions, Motion for Relief From Stay, Motion to Abandon, Motion to Expedite Hearing). (jhel) (Entered: 08/10/2022)

08/10/2022	114 (1 pg)	3-Day Transcript Requested by U LOCK INC regarding hearing held 08/09/2022. Transcript is being prepared by J&J Court Transcribers, Inc. Estimated completion date is 08/15/2022. (RE: related document(s): 109 Hearing Held). (hsmi) (Entered: 08/10/2022)
08/15/2022	115 (38 pgs)	Transcript regarding Hearing Held 08/09/2022. The transcript may be viewed at the Bankruptcy Court Clerk's Office. For information about how to contact the transcriber, call the Clerk's Office or contact the Court Reporter/Transcriber J&J Court Transcribers, Inc., Telephone number 609-586-2311. (RE: related document(s) 114 Transcript Request). Notice of Intent to Request Redaction due 8/22/2022. Redaction Request due 9/6/2022. Redacted Transcript Submission due 9/15/2022. Remote electronic access to the transcript is restricted through 11/14/2022. (hsmi) (Entered: 08/15/2022)
08/15/2022	116 (3 pgs; 2 docs)	Notice of Filing of Transcript. Notice is hereby given that a transcript of the hearing held on 08/09/2022 on Continued Expedited Motion to Dismiss Case, in addition to Motion For Sanctions Against Petitioning Creditor, or in the alternative Motion for Relief from Stay, or in the alternative Motion to Abandon the Movants Property; Order Granting Christine Biros Limited Relief from the Stay; Notice Regarding Non-Compliance as Directed by Paragraph 12 of the Order at Entry 36; Motion to Convert Case from Chapter 7 to 11; Exhibits to be referenced at hearing on 8/9/22 has been filed. Transcripts are available for inspection only at the Clerk's Office or may be purchased from the Court Transcriber during the 90 day restriction period. (RE: related document(s): 115 Transcript). (hsmi) (Entered: 08/15/2022)
08/17/2022	117 (7 pgs; 3 docs)	Application to Employ Eric E. Bononi, Esq., CPA as Accountant for the Trustee Filed by Trustee Robert H. Slone, Trustee. (Attachments: # 1 Exhibit # 2 Proposed Order) (Slone, Trustee, Robert) (Entered: 08/17/2022)
08/17/2022	118 (2 pgs)	Hearing on Trustee's Motion to Employ Accountant Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 117 Application to Employ filed by Trustee Robert H. Slone, Trustee). Hearing scheduled for 9/22/2022 at 10:00 AM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. Responses due by 9/6/2022. (Slone, Trustee, Robert) (Entered: 08/17/2022)
08/17/2022	119 (4 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 116 Notice of Filing of Transcript). Notice Date 08/17/2022. (Admin.) (Entered: 08/18/2022)
08/22/2022	120 (2 pgs)	Status Report Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 113 Hearing Continued). (Slone, Trustee, Robert) (Entered: 08/22/2022)
08/23/2022	121 (4 pgs; 2 docs)	Notice of Appeal <i>from Order Denying Motion to Convert</i> . Fee Amount \$ 298. Filed by U LOCK INC (RE: related document(s): 110 Order on Motion to Convert Case from Chapter 7 to Chapter 11). Appellant Designation due by 09/6/2022 for 110 ., (Roth, J.) (Entered: 08/23/2022)
08/23/2022	122	Receipt of Notice of Appeal(22-20823-GLT) [appeal,ntcapl] (298.00) filing fee. Receipt number A16028443, amount \$ 298.00. (U.S.

Treasury) (Entered: 08/23/2022)

08/24/2022	123 (2 pgs; 2 docs)	Letter Requesting Appeal Cover Sheet sent to J. Allen Roth, Esq. (mgut) (Entered: 08/24/2022)
08/24/2022	124 (2 pgs; 2 docs)	Letter to All Parties Regarding Filing Designations of Record on Appeal. cm: Debtor, J. Allen Roth, Esq., Robert Slone, Esq., Christine Biros, Sarah E. Wenrich, Esq., Shanni Snyder (RE: related document(s): 121 Notice of Appeal filed by Debtor U LOCK INC, 123 Letter Requesting Appeal Cover Sheet). (mgut) (Entered: 08/24/2022)
08/24/2022	125 (2 pgs; 2 docs)	Letter of Transmission to District Court. Documents Delivered to District Court. (RE: related document(s): 110 Order on Motion to Convert Case from Chapter 7 to Chapter 11, 121 Notice of Appeal filed by Debtor U LOCK INC, 123 Letter Requesting Appeal Cover Sheet, 124 Letter Regarding Filing Designations). (mgut) (Entered: 08/24/2022)
08/25/2022	126	Receipt of Electronic Notification from The United States District Court in the Western District of Pennsylvania. Miscellaneous/Civil Action No. 2:22-cv-01218. District Court Document No. 1. Name of Judge: Robert J. Colville. (RE: related document(s): 121 Notice of Appeal filed by Debtor U LOCK INC). (aala) (Entered: 08/25/2022)
08/26/2022	127 (1 pg)	Hearing Held on 8/25/2022 (RE: related document(s): 14 Motion to Dismiss Case filed by Creditor Christine Biros, Motion for Sanctions, Motion for Relief From Stay, Motion to Abandon, Motion to Expedite Hearing). 1. [Text Order] 2. [Text Order] 3. [Chambers to Issue] (aala) (Entered: 08/26/2022)
08/26/2022	128	TEXT ORDER: On August 25, 2022, the Court held a continued hearing on the Expedited Motion to Dismiss Case, in addition to Motion For Sanctions Against Petitioning Creditor, or in the alternative Motion for Relief from Stay or in the alternative Motion to Abandon the Movants Property [Dkt. No. 14]. Based upon statements made on the record at the August 25 hearing, it is hereby ORDERED that the Expedited Motion [Dkt. No. 14] is DENIED without prejudice with respect to any request for additional relief beyond the Order entered on June 3, 2022 at Dkt. No. 36. Judge Taddonio Signed on 8/26/2022. (RE: related document(s): 14 Expedited Motion to Dismiss Case, Motion For Sanctions Against Petitioning Creditor, Motion for Relief from Stay. Fee Amount \$188., Motion to Abandon the Movant's Property. Fee Amount \$ 188., Motion to Expedite Hearing. (hthu) (Entered: 08/26/2022)
08/26/2022	129	TEXT ORDER: On August 25, 2022, the Court held a continued hearing on the Expedited Motion to Dismiss Case, in addition to Motion For Sanctions Against Petitioning Creditor, or in the alternative Motion for Relief from Stay or in the alternative Motion to Abandon the Movants Property [Dkt. No. 14]. Based upon statements made on the record at the August 25 hearing, it is hereby ORDERED that on or before September 26, 2022, the trustee is directed to review the various alleged stay violations by the parties and determinewhether to file any appropriate causes of action. Judge Taddonio Signed on 8/26/2022. (hthu) (Entered: 08/26/2022)

08/26/2022	130 (1 pg)	3-Day Transcript Requested by U LOCK INC regarding hearing held 8/25/2022. Transcript is being prepared by J&J Court Transcribers, Inc. Estimated completion date is 8/31/2022. (RE: related document(s): 127 Hearing Held). (aolo) (Entered: 08/26/2022)
08/26/2022	131	The upcoming 341(a) meeting is scheduled to be held by phone. Call 1-866-687-2935 and use access code 3684723 to join the meeting. (Slone, Trustee, Robert) (Entered: 08/26/2022)
08/26/2022	132 (5 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 121 Notice of Appeal filed by Debtor U LOCK INC). Notice Date 08/26/2022. (Admin.) (Entered: 08/27/2022)
08/26/2022	133 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 124 Letter Regarding Filing Designations). Notice Date 08/26/2022. (Admin.) (Entered: 08/27/2022)
08/26/2022	134 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 125 Letter of Transmission to District Court). Notice Date 08/26/2022. (Admin.) (Entered: 08/27/2022)
08/30/2022	135 (8 pgs; 2 docs)	Motion For Sale of Property under Section 363(b) (<i>Rights of the Chapter 7 Trustee Regarding Property Located at 14140 U.S. Route 30, North Huntingdon, PA</i>) Filed by Trustee Robert H. Slone, Trustee. (Attachments: # 1 Proposed Order) (Slone, Trustee, Robert) (Entered: 08/30/2022)
08/30/2022	136 (2 pgs)	Hearing on Motion to Sell Property of the Estate--Rights of the Chapter 7 Trustee Regarding Property Located at 14140 U.S. Route 30, N. Huntingdon, PA Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 135 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee). Hearing scheduled for 10/6/2022 at 10:30 AM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. Responses due by 9/19/2022. (Slone, Trustee, Robert) (Entered: 08/30/2022)
08/31/2022	137 (15 pgs; 3 docs)	Motion For Sale of Property under Section 363(b) Filed by Trustee Robert H. Slone, Trustee. (Attachments: # 1 Exhibit # 2 Proposed Order) (Slone, Trustee, Robert) (Entered: 08/31/2022)
08/31/2022	138 (2 pgs)	Hearing on Trustee's Motion to Sell Personal Property of the Estate Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 137 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee). Hearing scheduled for 10/6/2022 at 10:30 AM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. Responses due by 9/19/2022. (Slone, Trustee, Robert) (Entered: 08/31/2022)
08/31/2022	139 (18 pgs)	Transcript regarding Hearing Held 08/25/2022. The transcript may be viewed at the Bankruptcy Court Clerk's Office. For information about how to contact the transcriber, call the Clerk's Office or contact the Court Reporter/Transcriber J&J Court Transcribers, Inc., Telephone number 609-586-2311. (RE: related document(s) 130 Transcript Request filed by Debtor U LOCK INC). Notice of Intent to Request Redaction due 9/7/2022. Redaction Request due 9/21/2022. Redacted Transcript Submission due 10/3/2022. Remote electronic access to the

transcript is restricted through 11/29/2022. (hsmi) (Entered: 08/31/2022)

08/31/2022	140 (3 pgs; 2 docs)	Notice of Filing of Transcript. Notice is hereby given that a transcript of the hearing held on 08/25/2022 on Continued Expedited Motion to Dismiss Case, in addition to Motion For Sanctions Against Petitioning Creditor, or in the alternative Motion for Relief from Stay, or in the alternative Motion to Abandon the Movants Property and Order Granting Christine Biros Limited Relief from the Stay has been filed. Transcripts are available for inspection only at the Clerk's Office or may be purchased from the Court Transcriber during the 90 day restriction period. (RE: related document(s): 139 Transcript). (hsmi) (Entered: 08/31/2022)
09/01/2022	141 (3 pgs)	Appeal Cover Sheet Filed by U LOCK INC (RE: related document(s): 121 Notice of Appeal). (Roth, J.) (Entered: 09/01/2022)
09/01/2022	142 (1 pg)	Statement of Issues on Appeal, Filed by U LOCK INC (RE: related document(s): 121 Notice of Appeal, 141 Appeal Cover Sheet). (Roth, J.) (Entered: 09/01/2022)
09/01/2022	143 (3 pgs; 2 docs)	Order Signed on 9/1/2022. It is hereby ORDERED, ADJUDGED, and DECREED that:1. The State Courts Writ of Possession Order is deemed VOID. (RE: related document(s): 1 Involuntary Petition Chapter 7). 14 Motion to Dismiss (aala) (Entered: 09/01/2022)
09/02/2022	144 (4 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 140 Notice of Filing of Transcript). Notice Date 09/02/2022. (Admin.) (Entered: 09/03/2022)
09/03/2022	145 (4 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 143 Order -Non-motion related-). Notice Date 09/03/2022. (Admin.) (Entered: 09/04/2022)
09/06/2022	148 (3 pgs; 2 docs)	Notice of Appeal . Receipt Number NFP,Fee Amount \$ 298. Filed by Shanni Snyder (RE: related document(s): 110 Order on Motion to Convert Case from Chapter 7 to Chapter 11). Appellant Designation due by 9/20/2022 for 110 and for 110 . . (aala) (Entered: 09/07/2022)
09/06/2022	149 (4 pgs; 2 docs)	Appeal Cover Sheet Filed by Shanni Snyder (RE: related document(s): 148 Notice of Appeal). (aala) (Entered: 09/07/2022)
09/07/2022	146 (10 pgs)	Appellant Designation of Contents For Inclusion in Record On Appeal Filed by U LOCK INC (RE: related document(s): 121 Notice of Appeal, 141 Appeal Cover Sheet, 142 Statement of Issues on Appeal). Appellee designation due by 09/21/2022 for 142 and for 141 and for 121 .. Transmission of Designation Due by 10/7/2022 for 142 and for 141 and for 121 .. (Roth, J.) (Entered: 09/07/2022)
09/07/2022	147 (1 pg)	Certificate of No Objection Regarding the Hearing on 9/22/2022. Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 117 Application to Employ filed by Trustee Robert H. Slone, Trustee, 118 Hearing on a Judge Taddonio Case Set by Attorney or Trustee filed by Trustee Robert H. Slone, Trustee). (Slone, Trustee, Robert) (Entered: 09/07/2022)

09/07/2022	150 (2 pgs; 2 docs)	Letter Requesting Appeal Cover Sheet (aala) (Entered: 09/07/2022)
09/07/2022	151 (2 pgs; 2 docs)	Letter to All Parties Regarding Filing Designations of Record on Appeal. cm: All Interested Parties (RE: related document(s): 148 Notice of Appeal filed by Petitioning Creditor Shanni Snyder). (aala) (Entered: 09/07/2022)
09/07/2022	152 (2 pgs; 2 docs)	Letter of Transmission to District Court. Documents Delivered to District Court. (RE: related document(s): 110 Order on Motion to Convert Case from Chapter 7 to Chapter 11, 148 Notice of Appeal filed by Petitioning Creditor Shanni Snyder). (aala) (Entered: 09/07/2022)
09/09/2022	153 (4 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 148 Notice of Appeal filed by Petitioning Creditor Shanni Snyder). Notice Date 09/09/2022. (Admin.) (Entered: 09/10/2022)
09/09/2022	154 (5 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 149 Appeal Cover Sheet filed by Petitioning Creditor Shanni Snyder). Notice Date 09/09/2022. (Admin.) (Entered: 09/10/2022)
09/09/2022	155 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 150 Letter Requesting Appeal Cover Sheet). Notice Date 09/09/2022. (Admin.) (Entered: 09/10/2022)
09/09/2022	156 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 151 Letter Regarding Filing Designations). Notice Date 09/09/2022. (Admin.) (Entered: 09/10/2022)
09/09/2022	157 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 152 Letter of Transmission to District Court). Notice Date 09/09/2022. (Admin.) (Entered: 09/10/2022)
09/12/2022	158 (2 pgs)	Proof of Publication of Notice of Sale Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 137 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee, 138 Hearing on a Judge Taddonio Case Set by Attorney or Trustee filed by Trustee Robert H. Slone, Trustee). (Slone, Trustee, Robert) (Entered: 09/12/2022)
09/12/2022	159 (2 pgs)	Proof of Publication of Notice of Sale Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 135 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee, 136 Hearing on a Judge Taddonio Case Set by Attorney or Trustee filed by Trustee Robert H. Slone, Trustee). (Slone, Trustee, Robert) (Entered: 09/12/2022)
09/12/2022	160	Trustee Certification of Services Rendered Under 11 U.S.C. Section 330(e). I rendered the following service in the case and am eligible for payment under 11 U.S.C. Section 330(e): Filed a Notice of Assets. I declare under penalty of perjury that the foregoing is true and correct. (Executed on 9/12/2022). Filed by Robert H. Slone, Trustee (RE: related document(s): 84 Notice of Assets & Request for Notice to Creditors). (Slone, Trustee, Robert) (Entered: 09/12/2022)

09/14/2022	161 (2 pgs; 2 docs)	Default Order Granting Application to Employ Eric E. Bononi, Esq. as Accountant for the Trustee. (Related Doc 117) Signed on 9/14/2022. (aala) (Entered: 09/15/2022)
09/17/2022	162 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 161 Order on Application to Employ). Notice Date 09/17/2022. (Admin.) (Entered: 09/18/2022)
09/20/2022	163 (2 pgs; 2 docs)	Motion to Withdraw/Dismiss Document (<i>Motions to Sell Property of the Estate</i>) Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 135 Motion for Sale of Property under Section 363(b), 136 Hearing on a Judge Taddonio Case Set by Attorney or Trustee, 137 Motion for Sale of Property under Section 363(b), 138 Hearing on a Judge Taddonio Case Set by Attorney or Trustee). (Attachments: # 1 Proposed Order) (Slone, Trustee, Robert) (Entered: 09/20/2022)
09/20/2022	164	Receipt of Electronic Notification from The United States District Court in the Western District of Pennsylvania. Miscellaneous/Civil Action No. 2:22-cv-1284. District Court Document No. 148. Name of Judge: Robert J. Colville. (RE: related document(s): 148 Notice of Appeal filed by Petitioning Creditor Shanni Snyder). (aala) (Entered: 09/20/2022)
09/21/2022	165 (2 pgs; 2 docs)	Notice of Intention to Transmit Partial Appeal. (RE: related document(s): 148 Notice of Appeal filed by Petitioning Creditor Shanni Snyder). Partial Appeal Document Completion Due Date: 10/5/2022. cm: All Interested Parties (aala) (Entered: 09/21/2022)
09/21/2022	166	Text Order re: (163 Motion to Withdraw/Dismiss Document -bk-). Without further notice or hearing, this pleading will be denied without prejudice if the following action is not taken: The motion appears to be incomplete. Counsel shall refile the motion and proposed order.. This text-only entry constitutes the Court's order and notice on this matter. Judge Taddonio Signed on 9/21/2022. (RE: related document(s): 163 Motion to Withdraw/Dismiss Document -bk-). Required corrective action due on or before 9/29/2022. (hthu) (Entered: 09/21/2022)
09/22/2022	167 (3 pgs; 2 docs)	Motion to Withdraw/Dismiss Document (<i>refiled per corrective entry</i>) Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 135 Motion for Sale of Property under Section 363(b), 136 Hearing on a Judge Taddonio Case Set by Attorney or Trustee, 137 Motion for Sale of Property under Section 363(b), 138 Hearing on a Judge Taddonio Case Set by Attorney or Trustee, 163 Motion to Withdraw/Dismiss Document -bk-, 166 Order Fixing Deadline to Deny a Motion). (Attachments: # 1 Proposed Order) (Slone, Trustee, Robert) (Entered: 09/22/2022)
09/22/2022	168 (2 pgs; 2 docs)	Letter of Transmission to District Court. Documents Delivered to District Court. (RE: related document(s): 121 Notice of Appeal filed by Debtor U LOCK INC, 141 Appeal Cover Sheet filed by Debtor U LOCK INC, 142 Statement of Issues on Appeal filed by Debtor U LOCK INC, 146 Appellant Designation filed by Debtor U LOCK INC). (aala) (Entered: 09/22/2022)

09/22/2022	169	Receipt of Electronic Notification from The United States District Court in the Western District of Pennsylvania. Miscellaneous/Civil Action No. 2:22-cv-01218. District Court Document No. 5. Name of Judge: Robert J. Colville. (RE: related document(s): 121 Notice of Appeal filed by Debtor U LOCK INC). (aala) (Entered: 09/22/2022)
09/23/2022	170 (3 pgs; 2 docs)	Amended Motion to Withdraw/Dismiss Document Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 135 Motion for Sale of Property under Section 363(b), 136 Hearing on a Judge Taddonio Case Set by Attorney or Trustee, 137 Motion for Sale of Property under Section 363(b), 138 Hearing on a Judge Taddonio Case Set by Attorney or Trustee, 167 Motion to Withdraw/Dismiss Document -bk-). (Attachments: # 1 Proposed Order) (Slone, Trustee, Robert) (Entered: 09/23/2022)
09/23/2022	171 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 165 Notice of Intention to Transmit Partial Appeal). Notice Date 09/23/2022. (Admin.) (Entered: 09/24/2022)
09/24/2022	172 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 168 Letter of Transmission to District Court). Notice Date 09/24/2022. (Admin.) (Entered: 09/25/2022)
09/27/2022	173 (2 pgs)	Status Report Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 129 Order -Non-motion related-). (Slone, Trustee, Robert) (Entered: 09/27/2022)
09/27/2022	174 (2 pgs; 2 docs)	Order Withdrawing Motion For Sale of Property under Section 363(b) (Related Doc # 135), and Withdrawing Motion For Sale of Property under Section 363(b) (Related Doc # 137),and Granting Motion to Withdraw/Dismiss Document (Related Doc # 170) Hearings scheduled for October 6, 2022 at 10:30 AM are cancelled. Signed on 9/27/2022. (aala) (Entered: 09/27/2022)
09/28/2022	175 (20 pgs; 3 docs)	Motion For Sale of Property under Section 363(b) <i>Tangible and Intangible Personal Property of the Estate</i> Filed by Trustee Robert H. Slone, Trustee. (Attachments: # 1 Exhibit # 2 Proposed Order) (Slone, Trustee, Robert) (Entered: 09/28/2022)
09/28/2022	176 (2 pgs)	Hearing on Motion for Sale of Property-Tangible and Intangible Personal Property of the Estate Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 175 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee). Hearing scheduled for 11/10/2022 at 10:30 AM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. Responses due by 10/17/2022. (Slone, Trustee, Robert) (Entered: 09/28/2022)
09/29/2022	177 (2 pgs)	Statement of Issues on Appeal, Filed by Shanni Snyder (RE: related document(s): 148 Notice of Appeal). (aala) (Entered: 09/29/2022)
09/29/2022	178 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 174 Order on Motion for Sale of Property under Section 363(b)). Notice Date 09/29/2022. (Admin.) (Entered: 09/30/2022)
10/05/2022	179 (24 pgs; 2 docs)	Appellant Designation of Contents For Inclusion in Record On Appeal Filed by Shanni Snyder (RE: related document(s): 148 Notice of

		Appeal). Appellee designation due by 10/19/2022 for 148 , . Transmission of Designation Due by 11/4/2022 for 148 , . (aala) (Entered: 10/05/2022)
10/07/2022	180 (25 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 179 Appellant Designation filed by Petitioning Creditor Shanni Snyder). Notice Date 10/07/2022. (Admin.) (Entered: 10/08/2022)
10/10/2022	181 (2 pgs)	Proof of Publication of Notice of Sale (<i>Tribune Review</i>) Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 175 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee, 176 Hearing on a Judge Taddonio Case Set by Attorney or Trustee filed by Trustee Robert H. Slone, Trustee). (Slone, Trustee, Robert) (Entered: 10/10/2022)
10/10/2022	182 (2 pgs)	Proof of Publication of Notice of Sale (<i>Westmoreland Law Journal</i>) Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 175 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee, 176 Hearing on a Judge Taddonio Case Set by Attorney or Trustee filed by Trustee Robert H. Slone, Trustee). (Slone, Trustee, Robert) (Entered: 10/10/2022)
10/17/2022	183 (11 pgs; 4 docs)	Objection to the Motion for Sale of Assets Regarding the Hearing on 11/10/2022. Filed by U LOCK INC (RE: related document(s): 175 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee). (Attachments: # 1 Proposed Order # 2 Certificate of Service # 3 Certificate of Service Attachment to Certificate of Service) (Roth, J.) (Entered: 10/17/2022)
10/17/2022	184 (5 pgs)	Objection To The Motion For Sale Regarding the Hearing on 11/10/2022. Filed by Shanni Snyder (RE: related document(s): 175 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee). (aala) (Entered: 10/18/2022)
10/18/2022	185 (4 pgs)	Objection To Motion for Sale Regarding the Hearing on 11/10/2022. Filed by George Snyder (RE: related document(s): 175 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee). (aala) (Entered: 10/18/2022)
10/20/2022	186 (2 pgs; 2 docs)	Letter of Transmission to District Court. Documents Delivered to District Court. (RE: related document(s): 177 Statement of Issues on Appeal filed by Petitioning Creditor Shanni Snyder, 179 Appellant Designation filed by Petitioning Creditor Shanni Snyder). (aala) (Entered: 10/20/2022)
10/21/2022	187	Receipt of Electronic Notification from The United States District Court in the Western District of Pennsylvania. Miscellaneous/Civil Action No. 2:22-cv-01284. District Court Document No. 6. Name of Judge: Robert J. Colville. (RE: related document(s): 148 Notice of Appeal filed by Petitioning Creditor Shanni Snyder, 177 Statement of Issues on Appeal filed by Petitioning Creditor Shanni Snyder, 179 Appellant Designation filed by Petitioning Creditor Shanni Snyder). (aala) (Entered: 10/21/2022)
10/22/2022	188 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 186 Letter of Transmission to District Court). Notice Date

10/22/2022. (Admin.) (Entered: 10/23/2022)

10/25/2022	189 (7 pgs; 2 docs)	Certification of Counsel Regarding <i>Stipulated Order for Relief From Stay</i> Filed by Creditor Christine Biros (Attachments: # 1 Stipulated Order) (Wenrich, Sarah) (Entered: 10/25/2022)
10/27/2022	190 (3 pgs; 2 docs)	Order Setting Hearing on (RE: related document(s): 189 Certification of Counsel Regarding filed by Creditor Christine Biros). Hearing scheduled for 11/2/2022 at 03:00 PM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. Responses due at the time of the hearing. (hthu) (Entered: 10/27/2022)
10/27/2022	191 (3 pgs; 2 docs)	Certificate of Service Regarding the Hearing on 11/2/2022. Filed by Creditor Christine Biros (RE: related document(s): 189 Certification of Counsel Regarding filed by Creditor Christine Biros, 190 Order Scheduling a Hearing). (Attachments: # 1 Matrix) (Wenrich, Sarah) (Entered: 10/27/2022)
10/28/2022	192	Receipt of Electronic Notification from The United States District Court in the Western District of Pennsylvania. Miscellaneous/Civil Action No. 2:22-cv-01485. District Court Document No. 1. Name of Judge: Robert J. Colville. (RE: related document(s): 148 Notice of Appeal filed by Petitioning Creditor Shanni Snyder). (aala) (Entered: 10/28/2022)
10/28/2022	193 (3 pgs; 2 docs)	Motion to Continue/Reschedule Hearing On <i>November 2, 2022</i> Filed by Debtor U LOCK INC (RE: related document(s): 189 Certification of Counsel Regarding, 190 Order Scheduling a Hearing). (Attachments: # 1 Proposed Order) (Roth, J.) (Entered: 10/28/2022)
10/28/2022	194	Text Order Rescheduling Hearing TIME ONLY: It is hereby ORDERED that the hearing on the Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee [Dkt. No. 175] scheduled for November 10, 2022 at 10:30 am is RESCHEDULED to November 10, 2022 at 11:30 am. This text only entry constitutes the Court's Order and Notice in this matter.Judge Taddonio signed on 10/28/2022. Hearing Scheduled for 11/10/2022 at 11:30 AM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. (hthu) (Entered: 10/28/2022)
10/28/2022	195 (2 pgs; 2 docs)	Order Granting Motion To Continue/Reschedule Hearing On (Related Doc # 193) Signed on 10/28/2022. Hearing rescheduled for 11/10/2022 at 11:30 AM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. (RE: related document(s): 189 Certification of Counsel Regarding). (aala) (Entered: 10/28/2022)
10/30/2022	196 (3 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 195 Order on Motion to Continue/Reschedule Hearing). Notice Date 10/30/2022. (Admin.) (Entered: 10/31/2022)
11/03/2022	197 (3 pgs)	Verified Statement / <i>Disclosure of Connections in Relation to the Proposed Sale [Doc. No. 175]</i> Filed by Creditor Christine Biros (Wenrich, Sarah) (Entered: 11/03/2022)
11/03/2022	198 (1 pg)	Verification of Connections for Shanni Snyder in Relation to Proposed Sale. Filed by Petitioning Creditor Shanni Snyder. (mgut) (Entered: 11/03/2022)

11/04/2022)

11/07/2022	199 (3 pgs; 2 docs)	Certification of Counsel Regarding <i>Designation of Debtor's Tax Return Responsibilities</i> Filed by Trustee Robert H. Slone, Trustee (Attachments: # 1 Stipulation and Consent Order) (Slone, Trustee, Robert) (Entered: 11/07/2022)
11/08/2022	200 (10 pgs)	Objection to the Certification Relating to Stipulated Order Regarding the Hearing on 11/10/2022. Filed by Debtor U LOCK INC (RE: related document(s): 189 Certification of Counsel Regarding filed by Creditor Christine Biros). (Roth, J.) (Entered: 11/08/2022)
11/08/2022	201	Text Order re: (200 Objection to the Certification Relating to Stipulated Order).. Without further notice or hearing, this pleading will be denied without prejudice if the following action is not taken: THE PROPOSED ORDER OF COURT SHOULD BE FILED AS AN ATTACHMENT; PLEASE RE-FILE UNDER EVENT CODE PROPOSED ORDER FOUND UNDER BANKRUPTCY/MISCELLANEOUS; LINK TO RELATED DOCUMENT. This text-only entry constitutes the Court's order and notice on this matter. Judge Taddonio Signed on 11/8/2022. (RE: related document(s): 200 Objection -Non-motion related-). Required corrective action due on or before 11/16/2022. (lfin) (Entered: 11/08/2022)
11/09/2022	202 (12 pgs; 2 docs)	Reply TO <i>OBJECTIONS TO SALE MOTION AND TO VERIFICATION OF CONNECTIONS OF SHANNI SNYDER</i> Regarding the Hearing on 11/10/22. Filed by Christine Biros (RE: related document(s): 175 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee, 183 Objection filed by Debtor U LOCK INC, 184 Objection filed by Petitioning Creditor Shanni Snyder, 185 Objection filed by Managing General Partner George Snyder, 198 Verified Statement filed by Petitioning Creditor Shanni Snyder). (Attachments: # 1 Exhibit A - Amended Schedules I & J) (Wenrich, Sarah) (Entered: 11/09/2022)
11/09/2022	203 (3 pgs; 2 docs)	Consent Order Regarding the Designation of Debtor's Tax Return Responsibilities to George Snyder Signed on 11/9/2022. (RE: related document(s): 199 Certification of Counsel Regarding). (dpas) (Entered: 11/09/2022)
11/09/2022	205 (3 pgs)	Petitioning Creditor's Objection to the Consent Order Regarding the Hearing on 11/10/2022. Filed by Petitioning Creditor Shanni Snyder (RE: related document(s): 189 Certification of Counsel Regarding filed by Creditor Christine Biros). (mgut) (Entered: 11/10/2022)
11/09/2022	206 (18 pgs; 2 docs)	Objections of George Snyder to Consent Order Regarding the Hearing on 11/10/2022. Filed by Managing General Partner George Snyder (RE: related document(s): 189 Certification of Counsel Regarding filed by Creditor Christine Biros). (Attachments: # 1 Exhibit) (mgut) (Entered: 11/10/2022)
11/10/2022	204 (1 pg)	Proposed Order RE: <i>Objections to Settlement and Certification of Counsel Regarding Stipulated Order</i> Filed by Debtor U LOCK INC (RE: related document(s): 200 Objection -Non-motion related- filed by Debtor U LOCK INC). (Roth, J.) (Entered: 11/10/2022)

11/10/2022	207 (3 pgs; 2 docs)	Notice of Appearance and Request for Notice by John B. Joyce Filed by Petitioning Creditor Shanni Snyder (Attachments: # 1 Certificate of Service) (Joyce, John) (Entered: 11/10/2022)
11/10/2022	208 (3 pgs; 2 docs)	Notice of Appearance and Request for Notice by Jeremy J Kobeski Filed by Petitioning Creditor Shanni Snyder (Attachments: # 1 Certificate of Service) (Kobeski, Jeremy) (Entered: 11/10/2022)
11/11/2022	209 (4 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 203 Order -Non-motion related-). Notice Date 11/11/2022. (Admin.) (Entered: 11/12/2022)
11/14/2022	210 (12 pgs; 2 docs)	Order Scheduling Hearing (RE: related document(s): 175 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee, 183 Objection filed by Debtor U LOCK INC, 184 Objection filed by Petitioning Creditor Shanni Snyder, 185 Objection filed by Managing General Partner George Snyder). Auction at Sale Hearing scheduled for 12/1/2022 at 10:00 AM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. Responses due by 11/30/2022. The trustee is directed to file an amended sale motion and notice of sale. Except as otherwise provided in this Order, all other objections to the Motion or the proposed sale are OVERRULED. (bsil) (Entered: 11/14/2022)
11/14/2022	211 (4 pgs; 2 docs)	Order Denying Stipulated Order for Relief from Stay Signed on 11/14/2022. (RE: related document(s): 189 Certification of Counsel Regarding, 200 Objection -Non-motion related-, 205 Objection -Non-motion related-, 206 Objection -Non-motion related-). (bsil) (Entered: 11/14/2022)
11/15/2022	212 (2 pgs)	Hearing Held on 11/10/2022 (RE: related document(s): 175 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee, 189 Certification of Counsel Regarding filed by Creditor Christine Biros). 1. [Chambers to Prepare] 2. [Chambers to Prepare] (aala) (Entered: 11/15/2022)
11/15/2022	213 (13 pgs; 2 docs)	Amended Order Scheduling Hearing on (RE: related document(s): 175 Motion for Sale of Property under Section 363(b) filed by Trustee Robert H. Slone, Trustee, 183 Objection filed by Debtor U LOCK INC, 184 Objection filed by Petitioning Creditor Shanni Snyder, 185 Objection filed by Managing General Partner George Snyder). Sale Hearing scheduled for 12/1/2022 at 10:00 AM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. Responses due no later than 4 p.m on 11/30/2022. Except as otherwise provided in this Order, all other objections to the Motion or the proposed sale are OVERRULED. (aala) (Entered: 11/15/2022)
11/15/2022	214 (2 pgs)	Meeting of Creditors Rescheduled by Trustee Filed by Robert H. Slone, Trustee. (Slone, Trustee, Robert) (Entered: 11/15/2022)
11/16/2022	215 (13 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 210 Order Scheduling Hearing). Notice Date 11/16/2022. (Admin.) (Entered: 11/17/2022)
11/16/2022	216 (5 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 211 Order -Non-motion related-). Notice Date 11/16/2022. (Admin.) (Entered: 11/17/2022)

11/17/2022	217 (11 pgs; 3 docs)	Motion to Sell Property Free and Clear of Liens under Section 363(f) . Re: Tangible and Intangible Personal Property of the Estate. Fee Amount \$188 Filed by Trustee Robert H. Slone, Trustee. (Attachments: # 1 Proposed Order # 2 Exhibit) (Slone, Trustee, Robert) (Entered: 11/17/2022)
11/17/2022	218 (8 pgs; 2 docs)	Amended Hearing on Trustees Amended Motion for Sale of Tangible and Intangible Personal Property of the Estate Under 11 U.S.C. Section 363(f) Free and Clear of all Liens, Claims and Encumbrances Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 217 Motion to Sell Property Free and Clear of Liens Under Section 363(f) filed by Trustee Robert H. Slone, Trustee). Hearing scheduled for 12/1/2022 at 10:00 AM via p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. Responses due by 11/30/2022. (Attachments: # 1 Exhibit) (Slone, Trustee, Robert) (Entered: 11/17/2022)
11/17/2022	219	The undersigned trustee hereby requests postponement of the fee required for filing Trustees Amended Motion for Sale of Tangible and Intangible Personal Property of the Estate Under 11 U.S.C. Section 363(f) Free and Clear of all Liens, Claims and Encumbrances. The fee will be paid at a later date, if there are assets available in the debtor's estate. Filed by Robert H. Slone, Trustee. (Slone, Trustee, Robert) (Entered: 11/17/2022)
11/17/2022	220 (3 pgs)	Certificate of Service Regarding the Hearing on 12/1/2022. Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 213 Order Scheduling Hearing, 217 Motion to Sell Property Free and Clear of Liens Under Section 363(f) filed by Trustee Robert H. Slone, Trustee, 218 Hearing on a Judge Taddonio Case Set by Attorney or Trustee filed by Trustee Robert H. Slone, Trustee). (Slone, Trustee, Robert) (Entered: 11/17/2022)
11/17/2022	221 (14 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 213 Order Scheduling Hearing). Notice Date 11/17/2022. (Admin.) (Entered: 11/18/2022)
11/18/2022	222	Receipt of Motion to Sell Property Free and Clear of Liens Under Section 363(f)(22-20823-GLT) [motion,msell] (0.00) filing fee. Receipt number POSTPONEMENT REQUESTED, amount \$ 0.00. (lkat) Modified on 11/18/2022 (lkat). (Entered: 11/18/2022)
11/28/2022	223 (2 pgs)	Proof of Publication of Notice of Sale Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 217 Motion to Sell Property Free and Clear of Liens Under Section 363(f) filed by Trustee Robert H. Slone, Trustee, 218 Hearing on a Judge Taddonio Case Set by Attorney or Trustee filed by Trustee Robert H. Slone, Trustee). (Slone, Trustee, Robert) (Entered: 11/28/2022)
11/30/2022	224 (7 pgs; 2 docs)	Notice Regarding Notice of Qualified Bids Regarding Sale of Tangible and Intangible Personal Property of the Estate Under 11 U.S.C. Section 363(f) Free and Clear of Liens, Claims and Encumbrances. Filed by Trustee Robert H. Slone, Trustee (RE: related document(s): 213 Order Scheduling Hearing, 217 Motion to Sell Property Free and Clear of Liens Under Section 363(f) filed by Trustee Robert H. Slone, Trustee, 218 Hearing on a Judge Taddonio Case Set by Attorney or Trustee filed by Trustee Robert H. Slone, Trustee). (Attachments: # 1 Exhibit) (Slone, Trustee, Robert) (Entered: 11/30/2022)

11/30/2022	225 (4 pgs)	Objection of George Snyder To Motion For Sale Regarding the Hearing on 12/01/2022. Filed by George Snyder (RE: related document(s): 217 Motion to Sell Property Free and Clear of Liens Under Section 363(f) filed by Trustee Robert H. Slone, Trustee). (aala) (Entered: 11/30/2022)
11/30/2022	226 (7 pgs)	Response in Opposition (Objection) Regarding the Hearing on 12/1/2022. Filed by U LOCK INC (RE: related document(s): 217 Motion to Sell Property Free and Clear of Liens Under Section 363(f) filed by Trustee Robert H. Slone, Trustee, 218 Hearing on a Judge Taddonio Case Set by Attorney or Trustee filed by Trustee Robert H. Slone, Trustee). (Roth, J.) (Entered: 11/30/2022)
11/30/2022	227 (14 pgs; 3 docs)	Objection to the Trustees Amended Motion for Sale of Tangible and Intangible Personal Property of the Estate Under 11 U.S.C. Section 363(f) Free and clear of All Liens, Claims and Encumbrances Regarding the Hearing on 12/01/22. Filed by Shanni Snyder (RE: related document(s): 217 Motion to Sell Property Free and Clear of Liens Under Section 363(f) filed by Trustee Robert H. Slone, Trustee). (Attachments: # 1 Proposed Order # 2 Certificate of Service) (Joyce, John) (Entered: 11/30/2022)
12/01/2022	228 (21 pgs; 4 docs)	Stipulation By Shanni Snyder and Between Charles O. Zebley, Jr., Chapter 7 Trustee, and Robert H. Slone, Chapter 7 Trustee,. Filed by Petitioning Creditor Shanni Snyder (Attachments: # 1 Exhibit A # 2 Proposed Order # 3 Certificate of Service) (Joyce, John) (Entered: 12/01/2022)
12/01/2022	229	The upcoming 341(a) meeting is scheduled to be held by phone. Call 1-866-687-2935 and use access code 3684723 to join the meeting. Filed by Robert H. Slone, Trustee. (Slone, Trustee, Robert) (Entered: 12/01/2022)
12/02/2022	230 (2 pgs)	Affidavit Filed by Petitioning Creditor Shanni Snyder (RE: related document(s): 217 Motion to Sell Property Free and Clear of Liens Under Section 363(f) filed by Trustee Robert H. Slone, Trustee). (Joyce, John) (Entered: 12/02/2022)
12/02/2022	231 (11 pgs; 8 docs)	Affidavit (Verification of Christine Biros) Filed by Creditor Christine Biros (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7) (Wenrich, Sarah) (Entered: 12/02/2022)
12/02/2022	232 (2 pgs)	Hearing Held on 12/01/2022 (RE: related document(s): 217 Motion to Sell Property Free and Clear of Liens Under Section 363(f) filed by Trustee Robert H. Slone, Trustee). 1. [Text Order] 2. [Chambers to Prepare] (aala) (Entered: 12/02/2022)
12/02/2022	233 (4 pgs)	Declaration of George Snyder In Reference To Certain Equipment filed by George Snyder (aala) (Entered: 12/02/2022)
12/02/2022	234 (5 pgs)	Supplemental Declaration Of George Snyder In Reference To Certain Equipment filed by George Snyder (aala) (Entered: 12/02/2022)

12/02/2022	235 (5 pgs)	Declaration Of George Snyder In Reference To Certain Equipment filed by George Snyder (aala) (Entered: 12/02/2022)
12/02/2022	236 (1 pg)	Status Report <i>With Address for Site Meeting</i> Filed by Creditor Christine Biros (RE: related document(s): 231 Affidavit filed by Creditor Christine Biros). (Wenrich, Sarah) (Entered: 12/02/2022)
12/02/2022	237	TEXT ORDER: It is hereby ORDERED that on or before December 2, 2022 at 10 a.m., George Snyder, Shanni Snyder, and Christine Biros shall each file a sworn affidavit signed under penalty of perjury pursuant to 28 U.S.C Section 1746 detailing the location of the assets listed on the Debtor's schedules and exhibits to the Amended Notice if Hearing dated November 17, 2022. Each party shall affirm that either: (a) they have not removed any property from the Debtor's place of business at 14140 Route 30, North Huntingdon PA; or (b) that, to the extent that they did not remove any property from the Debtor's place of business, where those assets are currently located and under what authority they were removed from the business premises. Judge Taddonio Signed on 12/2/2022. (RE: related document(s): 232 Hearing Held). (hthu) (Entered: 12/02/2022)
12/07/2022	238 (1 pg)	Notice of Appearance and Request for Notice by Robert S. Bernstein Filed by Creditor Christine Biros (Bernstein, Robert) (Entered: 12/07/2022)
12/07/2022	239 (2 pgs; 2 docs)	Order Continuing Evidentiary Hearing (RE: related document(s): 217 Motion to Sell Property Free and Clear of Liens Under Section 363(f) filed by Trustee Robert H. Slone, Trustee). Evidentiary hearing Continued to 12/15/2022 at 10:00 AM at p01 Courtroom A, 54th Floor, U.S. Steel Tower, Pittsburgh. (dpas) (Entered: 12/07/2022)
12/08/2022	240 (2 pgs)	Meeting of Creditors Rescheduled by Trustee Filed by Robert H. Slone, Trustee. (Slone, Trustee, Robert) (Entered: 12/08/2022)
12/08/2022	241	The upcoming 341(a) meeting is scheduled to be held by phone. Call 1-866-687-2935 and use access code 3684723 to join the meeting. Filed by Robert H. Slone, Trustee. (Slone, Trustee, Robert) (Entered: 12/08/2022)
12/09/2022	242	Update Meeting of Creditors (RE: related document(s): 80 Meeting of Creditors Chapter 7 Asset Business/Corporation). 341(a) meeting to be held on 1/6/2023 at 11:00 AM at 341 telephonic hearing. (aala) (Entered: 12/09/2022)
12/09/2022	243 (1 pg)	Notice of Appearance and Request for Notice by Daniel McArdle Booker Filed by Creditor Christine Biros (Booker, Daniel) (Entered: 12/09/2022)
12/09/2022	244 (4 pgs)	BNC Certificate of Mailing - PDF Document. (RE: related document(s): 239 Order Scheduling Hearing). Notice Date 12/09/2022. (Admin.) (Entered: 12/10/2022)

Fill in this information to identify the case:

United States Bankruptcy Court for the:

WESTERN

District of

PENNSYLVANIA

(State)

Case number (if known): Chapter

RECEIVED

APR 27 2022

CLERK, U.S. BANKRUPTCY COURT
WEST DIST OF PENNSYLVANIA

☐ Check if this is an
amended filing

Official Form 205

Involuntary Petition Against a Non-Individual

12/15

Use this form to begin a bankruptcy case against a non-individual you allege to be a debtor subject to an involuntary case. If you want to begin a case against an individual, use the *Involuntary Petition Against an Individual* (Official Form 105). Be as complete and accurate as possible. If more space is needed, attach any additional sheets to this form. On the top of any additional pages, write debtor's name and case number (if known).

Part 1: Identify the Chapter of the Bankruptcy Code Under Which Petition Is Filed

1. Chapter of the
Bankruptcy Code

Check one:

☒ Chapter 7

☐ Chapter 11

Part 2: Identify the Debtor

2. Debtor's name

U LOCK INC

3. Other names you know
the debtor has used in
the last 8 years

U-LOCK INC.

Include any assumed
names, trade names, or
doing business as names.

4. Debtor's federal
Employer Identification
Number (EIN)

☐ Unknown

4 7 - 4 9 9 4 9 1 1
EIN

5. Debtor's address

Principal place of business

14140 U.S. Route 30

Number Street

N Huntingdon

City

PA 15642

State ZIP Code

Mailing address, if different

Number Street

P.O. Box

City State ZIP Code

Location of principal assets, if different from
principal place of business

Westmoreland

County

Number Street

City State ZIP Code

Debtor

U LOCK INC a/k/a U-LOCK INC.

Case number (if known)

6. Debtor's website (URL)

7. Type of debtor

- ☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
☐ Partnership (excluding LLP)
☐ Other type of debtor. Specify:

8. Type of debtor's business

Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☒ None of the types of business listed.
☐ Unknown type of business.

9. To the best of your knowledge, are any bankruptcy cases pending by or against any partner or affiliate of this debtor?

- ☒ No
☐ Yes. Debtor Relationship
District Date filed Case number, if known
MM / DD / YYYY
Debtor Relationship
District Date filed Case number, if known
MM / DD / YYYY

Part 3: Report About the Case

10. Venue

Check one:

- ☒ Over the last 180 days before the filing of this bankruptcy, the debtor had a domicile, principal place of business, or principal assets in this district longer than in any other district.
☐ A bankruptcy case concerning debtor's affiliates, general partner, or partnership is pending in this district.

11. Allegations

Each petitioner is eligible to file this petition under 11 U.S.C. § 303(b).
The debtor may be the subject of an involuntary case under 11 U.S.C. § 303(a).

At least one box must be checked:

- ☒ The debtor is generally not paying its debts as they become due, unless they are the subject of a bona fide dispute as to liability or amount.
☒ Within 120 days before the filing of this petition, a custodian, other than a trustee, receiver, or an agent appointed or authorized to take charge of less than substantially all of the property of the debtor for the purpose of enforcing a lien against such property, was appointed or took possession.

12. Has there been a transfer of any claim against the debtor by or to any petitioner?

- ☒ No
☐ Yes. Attach all documents that evidence the transfer and any statements required under Bankruptcy Rule 1003(a).

Debtor U LOCK INC. a/k/a U-Lock Inc. Case number (if known) _____
Name _____

13. Each petitioner's claim

Name of petitioner

Nature of petitioner's claim

Amount of the claim
above the value of
any lien

Shanni Snyder

unpaid wages + liq damage \$ 262,000

retaliation under FLSA \$ 100,000

interest \$ 13,100

\$ _____

Single creditor case.

Total of petitioners' claims \$ 375,100

If more space is needed to list petitioners, attach additional sheets. Write the alleged debtor's name and the case number, if known, at the top of each sheet. Following the format of this form, set out the information required in Parts 3 and 4 of the form for each additional petitioning creditor, the petitioner's claim, the petitioner's representative, and the petitioner's attorney. Include the statement under penalty of perjury set out in Part 4 of the form, followed by each additional petitioner's (or representative's) signature, along with the signature of the petitioner's attorney.

Part 4: Request for Relief

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Petitioners request that an order for relief be entered against the debtor under the chapter of 11 U.S.C. specified in this petition. If a petitioning creditor is a corporation, attach the corporate ownership statement required by Bankruptcy Rule 1010(b). If any petitioner is a foreign representative appointed in a foreign proceeding, attach a certified copy of the order of the court granting recognition.

I have examined the information in this document and have a reasonable belief that the information is true and correct.

Petitioners or Petitioners' Representative

Name and mailing address of petitioner

Shanni Snyder

Name

14140 US Route 30

Number Street

North Huntingdon

PA

15642

City

State

ZIP Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

City

State

ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

4/25/22
MM / DD / YYYY

x

[Signature]
Signature of petitioner or representative, including representative's title

Attorneys

Printed name

Firm name, if any

Number Street

City

State

ZIP Code

Contact phone

Email

Bar number

State

x

[Signature]
Signature of attorney

Date signed

MM / DD / YYYY

MAY 09 2022

WESTERN District of PENNSYLVANIA

District of PER
(State)

Case number (if known): 22-20822 Chapter 7

22-20823

AKC

Amended

CLERK, U.S. BANKRUPTCY COURT
WEST DIST OF PENNSYLVANIA

Amending Involuntary Petition
placed in court mailbox on
4/25/2022.

12/15

Part 1: Identify the Chapter of the Bankruptcy Code Under Which Petition Is Filed

Check one:

Chapter 7

Chapter 11

1b. Statement per W.Pa.LBR 1003-1: Petitioning Creditor declares under the penalty for perjury that she does not know the precise share structure, identity of the Board of Directors, or the official officers of the Debtor. Based on information, there are between three and five officers and/or Board Members. Two managing control persons appear to be George Snyder and Kash Snyder. There also appears to be closely affiliated control creditors, but the total number of creditors are less than 12.

2. Debtor's name

U LOCK INC

U-LOCK INC.

☐ Unknown

4 7 - 4 9 9 4 9 1 1
 EIN

Principal place of business

14140 U.S. Route 30

Number	Street
--------	--------

N Huntingdon

City

PA 15642

State	ZIP Code
-------	----------

Mailing address, if different

Number	Street
--------	--------

P.O. Box

City

State	ZIP Code
-------	----------

Location of principal assets, if different from principal place of business

Westmoreland

County

Number	Street
--------	--------

City

State	ZIP Code
-------	----------

Debtor

U LOCK INC a/k/a U-LOCK INC.

Name

Case number (if known)

22-20822

22-20833

6. Debtor's website (URL)

7. Type of debtor

- ☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
☐ Partnership (excluding LLP)
☐ Other type of debtor. Specify: _____

8. Type of debtor's business

Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☒ None of the types of business listed.
☐ Unknown type of business.

9. To the best of your knowledge, are any bankruptcy cases pending by or against any partner or affiliate of this debtor?

☒ No

- ☐ Yes. Debtor _____ Relationship _____
District _____ Date filed _____ Case number, if known _____
MM / DD / YYYY
Debtor _____ Relationship _____
District _____ Date filed _____ Case number, if known _____
MM / DD / YYYY

Part 3: Report About the Case

10. Venue

Check one:

- ☒ Over the last 180 days before the filing of this bankruptcy, the debtor had a domicile, principal place of business, or principal assets in this district longer than in any other district.
☐ A bankruptcy case concerning debtor's affiliates, general partner, or partnership is pending in this district.

11. Allegations

Each petitioner is eligible to file this petition under 11 U.S.C. § 303(b).

The debtor may be the subject of an involuntary case under 11 U.S.C. § 303(a).

At least one box must be checked.

- ☒ The debtor is generally not paying its debts as they become due, unless they are the subject of a bona fide dispute as to liability or amount.
☒ Within 120 days before the filing of this petition, a custodian, other than a trustee, receiver, or an agent appointed or authorized to take charge of less than substantially all of the property of the debtor for the purpose of enforcing a lien against such property, was appointed or took possession.

12. Has there been a transfer of any claim against the debtor by or to any petitioner?

☒ No

- ☐ Yes. Attach all documents that evidence the transfer and any statements required under Bankruptcy Rule 1003(a).

22-20822

22-20822

Debtor U LOCK INC. a/k/a U-Lock Inc.
 Name

Case number (if known)

13. Each petitioner's claim

Name of petitioner

Nature of petitioner's claim

Amount of the claim
above the value of
any lien

Shanni Snyder

unpaid wages + liq damage \$ 262,000

retaliation under FLSA \$ 100,000

interest \$ 13,100

Single creditor case.

Total of petitioners' claims \$ 375,100

If more space is needed to list petitioners, attach additional sheets. Write the alleged debtor's name and the case number, if known, at the top of each sheet. Following the format of this form, set out the information required in Parts 3 and 4 of the form for each additional petitioning creditor, the petitioner's claim, the petitioner's representative, and the petitioner's attorney. Include the statement under penalty of perjury set out in Part 4 of the form, followed by each additional petitioner's (or representative's) signature, along with the signature of the petitioner's attorney.

Part 4: Request for Relief

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Petitioners request that an order for relief be entered against the debtor under the chapter of 11 U.S.C. specified in this petition. If a petitioning creditor is a corporation, attach the corporate ownership statement required by Bankruptcy Rule 1010(b). If any petitioner is a foreign representative appointed in a foreign proceeding, attach a certified copy of the order of the court granting recognition.

I have examined the information in this document and have a reasonable belief that the information is true and correct.

Petitioners or Petitioners' Representative

Attorneys

Name and mailing address of petitioner

Shanni Snyder

Name

14140 US Route 30

Number Street

North Huntingdon

PA

15642

City

State

ZIP Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

City

State

ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

MM / DD / YYYY

05/03/2022

X

Signature of attorney

Date signed

MM / DD / YYYY

Signature of petitioner or representative, including representative's title

Form 132

UNITED STATES BANKRUPTCY COURT 41
WESTERN DISTRICT OF PENNSYLVANIA aala

In re: Bankruptcy Case No.: 22-20823-GLT
Chapter: 7

U LOCK INC
aka U-LOCK INC.
47-4994911
Debtor(s)

**NOTICE OF APPOINTMENT OF INTERIM TRUSTEE
AND DETERMINATION OF TRUSTEE BOND**

Charles O. Zebley Jr. is hereby appointed Interim Trustee for the estate of the above debtor(s). Unless another trustee is elected at the meeting of creditors, convened pursuant to 11 U.S.C §341(a), the Interim Trustee shall serve as Trustee.

In accordance with 11 U.S.C §322(b), the United States Trustee has determined the amount of the blanket trustee bond and determined the sufficiency of the surety thereon.

Dated: 6/17/22

Andrew R. Vara
United States Trustee

Joseph S. Sisca
Assistant United States Trustee
Western District of Pennsylvania

I Charles O. Zebley Jr., hereby reject appointment as Trustee.

Dated: This _____ day of _____, _____.

Charles O. Zebley Jr.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re:	:	Case No. 22-20823-GLT
	:	Chapter 7
U LOCK INC,	:	
	:	Related Dkt. No. 1
<i>Debtor.</i>	:	

ORDER FOR RELIEF UNDER CHAPTER 7

On April 27, 2022, petitioning creditor, Shanni Sue Snyder, commenced this case by filing an involuntary petition for chapter 7 bankruptcy relief against U LOCK INC.¹ After reviewing the docket in this matter, the Court finds that the summons and involuntary petition were duly served and U LOCK INC has not filed a timely response, despite having appeared before the Court on June 2, 2022 when the response date was specifically discussed.² Based on the foregoing, and pursuant to 11 U.S.C. § 303(h), the Court hereby grants the involuntary petition and issues this Order for Relief under chapter 7 of title 11 of the United State Code.

Dated: June 17, 2022



GREGORY J. TADDONIO
UNITED STATES BANKRUPTCY JUDGE

Case administrator to mail to:
U LOCK INC
J. Allen Roth, Esq.
Office of the United States Trustee

¹ Dkt. No. 1.

² Dkt. No. 34.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: : Case No. 22-20823-GLT
:
U LOCK INC., : Chapter 7
:
Debtor. :
:

**ORDER AND NOTICE REGARDING
INVOLUNTARY CHAPTER 7 PETITION**

AND NOW, this 17th day of June 2022, **U LOCK INC.** and its principal operating officer, **George Snyder**, are each hereby **ORDERED AND DIRECTED** to file the following documents pursuant to 11 U.S.C. §§ 329 and 521 and Rules 1007 and 2016 of the Federal Rules of Bankruptcy Procedure:

- (1) the Schedules and a Summary of Schedules;
- (2) the Statement of Financial Affairs;
- (3) a Statement of Attorney; and
- (4) a Mailing Matrix listing the names and addresses of all parties required by W.P.A.LBR 1007-1.

IT IS FURTHER ORDERED that if the above documents are not filed pursuant to this *Order* by July 5, 2022, a *Rule to Show Cause Why U LOCK INC. and George Snyder Should Not Be Held in Contempt or Sanctioned* is hereby scheduled for July 7, 2022 at 11:00 a.m. in Courtroom A, 54th Floor, U.S. Steel Tower, 600 Grant St., Pittsburgh, Pennsylvania.

Dated: June 17, 2022



GREGORY TADDONE, ^{Act}
UNITED STATES BANKRUPTCY JUDGE

Case administrator to mail to:
U LOCK INC.
J. Allen Roth, Esq.
Office of the U.S. Trustee

Form 132

UNITED STATES BANKRUPTCY COURT 49
WESTERN DISTRICT OF PENNSYLVANIA aala

In re: Bankruptcy Case No.: 22-20823-GLT

Chapter: 7

U LOCK INC
aka U-LOCK INC.
47-4994911
Debtor(s)

**NOTICE OF APPOINTMENT OF INTERIM TRUSTEE
AND DETERMINATION OF TRUSTEE BOND**

Robert H. Slone, Trustee is hereby appointed Interim Trustee for the estate of the above debtor(s). Unless another trustee is elected at the meeting of creditors, convened pursuant to 11 U.S.C §341(a), the Interim Trustee shall serve as Trustee.

In accordance with 11 U.S.C §322(b), the United States Trustee has determined the amount of the blanket trustee bond and determined the sufficiency of the surety thereon.

Dated: 6/22/22

Andrew R. Vara
United States Trustee

Joseph S. Sisca
Assistant United States Trustee
Western District of Pennsylvania

I Robert H. Slone, Trustee, hereby reject appointment as Trustee.

Dated: This _____ day of _____, _____.

Robert H. Slone, Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:

U LOCK INC.,

Bankr. No. 22-20823-GLT

Debtor.

Chapter 7

U LOCK INC.,

Movant,

v.

CHRISTINE BIROS,
SHANNI SNYDER,
ROBERT SLONE, TRUSTEE
UNITED STATES TRUSTEE,

Respondents.

MOTION OF U LOCK INC. TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 11

AND NOW COMES U LOCK INC., debtor herein, by and through its counsel, J. Allen Roth, Esq., and moves this Court for an Order converting this case from Chapter 7 to Chapter 11, Subchapter V of the United States Bankruptcy Code and 11 USC 706(a):

1. The Court has jurisdiction over the Motion pursuant to 28 U.S.C. § 1334.
2. Venue is proper before this Court pursuant to 28 U.S.C. §1408.
3. The statutory and rule-based predicates for the relief requested herein are sections 105(a) and 706(a) of the Bankruptcy Code, Rules 1017(f) and 9013 of the Federal Rules of Bankruptcy Procedure.

background

4. The Debtor is a Pennsylvania corporation.
5. On April 27, 2022, Shanni Snyder commenced an involuntary bankruptcy petition against U Lock.
6. On May 9, 2022, the involuntary petition was amended.
7. On June 17, 2022, this Court entered an Order for Relief.

discussion

8. The Debtor desires to manage its property and complicated litigation claims that it has as a debtor-in- possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.
9. Pursuant to section 706(a) of the Bankruptcy Code: The debtor may convert a case under this chapter to a case under chapter 11 . . . of this title at any time, if the case has not been converted under section 1112, 1208, or 1307 of this title. Any waiver of the right to convert a case under this subsection is unenforceable. 11 U.S.C. § 706(a).
10. This includes the period prior to and after the entry of an order for relief. Indeed, at least one bankruptcy court has held that a motion to convert is an acceptable response to an involuntary petition, with the order converting the case constituting an order for relief under the chosen chapter. See *In re Source Enterprises, Inc.*, 2006 Bankr. LEXIS 3094 (Bankr. S.D.N.Y. Nov. 8, 2006); see also 11 U.S.C. §348(a).

11. Section 706 sets forth only two prerequisites to conversion: (i) that the case has not previously been converted and (ii) that the debtor is eligible for the chapter chosen. See 11 U.S.C. §§ 706(a), (d).
12. Both of these elements are satisfied in this case.
13. The case has not previously been converted and the Debtor is eligible to be a debtor in chapter 11.
14. A Chapter 11 provides the best mechanism to a meaningful recovery to creditors, shareholders, and to recover of various claims.
15. U Lock intends to quickly and efficiently advance a reorganization of the Debtor under a plan.
16. U Lock has a near absolute right to convert the case pursuant to Section 706(a), which is limited only by extreme circumstances not present here. See, e.g., *In re Richardson*, 43 Bankr. 636, 638 (Bankr. M.D. Fla. 1984) ("The legislative history of § 706(a) makes it clear that the debtor has a 'one-time absolute right of conversion of a liquidation case to a reorganization or individual repayment plan.'") (citing H.R. Rep. No. 595, 95th Cong., 1st Sess. 380 (1977); S. Rep. No. 989, 95th Cong., 2d Sess. 94 (1978)); *In re Premier General Holdings, Ltd.*, 427 B.R. 592, 600 (Bankr. W.D. Tex. 2010) ("[E]ven if an order for relief is entered on a petitioning creditor's involuntary chapter 7 petition, the debtor has a near unbridled right to convert the case to chapter 11").
17. Indeed courts have recognized a debtor's right to select the chapter under which the bankruptcy will proceed. *In re Holdco Capital Grp.*, 2011 Bankr.

LEXIS 988, at *24 (Bankr. N.D. Ind. March 29, 2011) (holding that a subsequent voluntary petition would not result in the dismissal of an existing contested involuntary petition, but that the debtor's choice of chapter would be honored.).

18. Accordingly, an order converting the Partnership's bankruptcy case to a case administered under chapter 11 of the Bankruptcy Code is warranted and should be entered

WHEREFORE, for the reasons set forth herein U Lock Inc. respectfully requests that the Court enter an order (a) converting this bankruptcy case to a case administered under chapter 11 of the Bankruptcy Code, Subchapter V and (b) granting such other and further relief as the Court deems just and proper.

Date of Service: July 1, 2022

Respectfully submitted,

/s/ J. Allen Roth, Esq.

J. Allen Roth
805 S. Alexandria St
Latrobe PA 15650
(724) 537-0939
lawmatters@yahoo.com

Information to identify the case:

Debtor **U LOCK INC** EIN: 47-4994911
 Name
 United States Bankruptcy Court WESTERN DISTRICT OF PENNSYLVANIA Date case filed for chapter: 7 4/27/22
 Case number: 22-20823-GLT

Official Form 309D (For Corporations or Partnerships)

Notice of Chapter 7 Bankruptcy Case -- Proof of Claim Deadline Set

10/20

For the debtor listed above, a case has been filed under chapter 7 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from debtors by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at <https://pacer.uscourts.gov>).

The staff of the bankruptcy clerk's office cannot give legal advice.

Do not file this notice with any proof of claim or other filing in the case.

1. Debtor's full name	U LOCK INC	
2. All other names used in the last 8 years	aka U-LOCK INC.	
3. Address	14140 U.S. Route 30 N. Huntingdon, PA 15642	
4. Debtor's attorney Name and address	J. Allen Roth 805 S Alexandria Street Latrobe, PA 15650	Contact phone 724-537-0939 Email: lawmatters@yahoo.com
5. Bankruptcy trustee Name and address	Robert H. Slone, Trustee 223 South Maple Avenue Greensburg, PA 15601	Contact phone 724-834-2990 Email: robertslone223@gmail.com
6. Bankruptcy clerk's office Documents in this case may be filed at this address. You may inspect all records filed in this case at this office or online at https://pacer.uscourts.gov .	U.S. Bankruptcy Court 5414 U.S. Steel Tower 600 Grant Street Pittsburgh, PA 15219	Hours open: Mon. - Fri. Pittsburgh Office: 9:00a.m. - 4:30p.m. Erie Office: 9:00a.m. - 4:30p.m. Contact phone 412-644-2700 Date: 7/7/22
7. Meeting of creditors The debtor's representative must attend the meeting to be questioned under oath. Creditors may attend, but are not required to do so.	September 9, 2022 at 09:00 AM The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.	Location: 341 Meeting will be conducted by phone, please consult the docket or, case trustee for call information.

For more information, see page 2 >

Debtor **U LOCK INC**

Case number **22-20823-GLT**

<p>8. Deadlines The bankruptcy clerk's office must receive proofs of claim by the following deadlines.</p>	<p>Deadline for all creditors to file a proof of claim Filing deadline: 8/26/22 (except governmental units):</p> <p>Deadline for governmental units to file a proof of claim: Filing deadline: 12/14/22</p> <p>A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be obtained at www.uscourts.gov or any bankruptcy clerk's office. If you do not file a proof of claim by the deadline, you might not be paid on your claim. To be paid, you must file a proof of claim even if your claim is listed in the schedules that the debtor filed.</p> <p>Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits the creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.</p>
<p>9. Creditors with a foreign address</p>	<p>If you are a creditor receiving a notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.</p>
<p>10. Liquidation of the debtor's property and payment of creditors' claims</p>	<p>The bankruptcy trustee listed on the front of this notice will collect and sell the debtor's property. If the trustee can collect enough money, creditors may be paid some or all of the debts owed to them, in the order specified by the Bankruptcy Code. To ensure you receive any share of that money, you must file a proof of claim, as described above.</p>

Official Form 309D (For Corporations or Partnerships) **Notice of Chapter 7 Bankruptcy Case -- Proof of Claim Deadline Set**

page 2

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: U LOCK INC, Debtor.	Bankr. No. 22-20823-GLT Chapter 11
U LOCK INC, Movant, v. CHRISTINE BIROS, ROBERT SLONE, SHANNI SNYDER, and UNITED STATES TRUSTEE, Respondents.	Related Doc. No.: 53 Response Deadline: July 19, 2022 Hearing: August 9, 2022 at 2:00 pm

**RESPONSE IN OPPOSITION TO MOTION OF U LOCK INC. TO CONVERT CASE
FROM CHAPTER 7 TO CHAPTER 11**

AND NOW comes Christine Biros (“Biros”), by and through her undersigned counsel, and files this response in opposition to *Motion of U Lock Inc. to Convert Case from Chapter 7 to Chapter 11* [Doc. No. 53] (the “Motion”) and in support thereof, avers as follows:

1. Contrary to the assertion made by U Lock Inc (the “Debtor”) in its Motion, the facts and circumstances in play in this Case support the denial of the Motion. In addition to the broad discretion granted to the Court to deny a debtor’s request to convert a case if conversion would be futile, the Court must also consider whether this Debtor has received the requisite authority to consent to the bankruptcy and convert the case to Chapter 11. *See* W.D.Pa. L.B.R. 1002-10.¹

¹ While this case was not commenced as a voluntary case, the Debtor’s decision to consent to the bankruptcy and take action to convert this Case to a Chapter 11 case requires the same duly authorized consent.

to convert is left in the sound discretion of the court, based on what will most inure to the benefit of all parties in interest.

H.R. Rep. No. 95-595, at 380 (1977), as reprinted in 1978 U.S.C.C.A.N. 5963; S. Rep. No. 95-989, at 94 (1978), as reprinted in 1978 U.S.C.C.A.N. 5787 (emphasis added).

5. The conversion of this Case to chapter 11 would be futile and the Debtor's request for conversion should be denied.

6. If this Case were to be converted, it would likely be immediately re-converted to Chapter 7 or dismissed pursuant to 11 U.S.C. § 1112(b)(1) for "cause."

7. "Cause" includes substantial or continuing loss to or diminution of the estate and the absence of a reasonable likelihood of rehabilitation, gross mismanagement of the estate, or failure to maintain appropriate insurance that poses a risk to the estate or to the public. 11 U.S.C. § 1112(b)(4). Each of these factors standing alone gives rise to cause to convert or dismiss a chapter 11 case. All of these circumstances are present in this Case.

8. First, the parties controlling the Debtor have continued to take action against property of the estate, notwithstanding the fact that a trustee has been appointed and the Debtor is no longer in possession. For example, these parties have caused certain equipment owned by the Debtor to be removed from the real property located at 14140 U.S. Route 30, North Huntingdon, Pennsylvania (the "Property") on which the Debtor is allegedly operating its business. Upon information and belief, such equipment has been returned. However, it is unclear whether property of the estate will be depleted by these same parties in the future if the case is converted to chapter 11 and the Debtor is permitted to remain in possession of the estate and its assets.

9. Further, the Debtor's legal fees alone in this case – which will only increase upon conversion to a Chapter 11 Case – will certainly outweigh the Debtor's revenue at approximately \$1,000 per month. Upon conversion, the Debtor will be required to address the outstanding

citations against the Property which require remediation and clean-up in order for the Debtor to continue any operations. With the meager income alleged, the Debtor will not be able to afford the work necessary.

10. The Debtor has also been ordered to pay outstanding taxes on the Property and to “keep such taxes current during the pendency of its occupancy of the Property.” A true and correct copy of this Order is attached hereto as **Exhibit A**. At this time, the outstanding taxes on the Property exceed \$20,000. A true and correct copy of the real estate tax lien certificate related to the Property is attached hereto as **Exhibit B**. The Debtor’s income is insufficient to pay outstanding taxes or to continue to keep any such taxes current during any continued occupancy of the Property.

11. The estate has already been diminished and will continue to be depleted if the Case is converted.

12. With the minimal income expected from the Debtor’s alleged business and an absence of meaningful business operations, there is not a reasonable likelihood of rehabilitation.

13. There are also numerous issues related to the Debtor’s current occupancy of the Property in question. The Property upon which the Debtor allegedly operates its business is located on property owned by the Movant. This is problematic because, as the Court is aware, the Debtor does not have the Movant’s permission to remain on the Property and there is no lease that the Debtor may assume which would permit it to remain on the Property.

14. A separate issue relates to the Debtor’s failure to obtain an occupancy permit to operate its business on the Property. In order to obtain such a permit, the Movant’s consent would be required.

15. Due to the diminution of the estate and the lack of a reasonable likelihood of rehabilitation, the Case will be ripe for conversion or dismissal for “cause” under 11 U.S.C. § 1112(b)(4)(A).

16. Further, the Debtor has failed to file any tax returns for any of the approximately seven years that it has been in existence. In addition to this, the Movant has reason to believe that the Debtor has failed to observe any corporate formalities that are required for a corporation to operate a business in Pennsylvania. Such lack of corporate formalities and failure to ever file tax returns amounts to gross mismanagement.

17. Therefore, the Case would also be poised for conversion or dismissal for “cause” under 11 U.S.C. § 1112(b)(4)(B).

18. Additionally, at the hearing held in this Case on July 6, 2022, the Debtor acknowledged that it did not have any insurance related to its operations. Such failure to obtain the requisite insurance contributes to the finding of gross mismanagement, but also rises to cause to dismiss or convert a Chapter 11 case on that basis alone pursuant to 11 U.S.C § 1112(b)(4)(C).

19. For all of these reasons, it is likely that conversion of this Case would result in the almost immediate dismissal or conversion back to a Chapter 7 case.

20. As such, conversion of this Case to a Chapter 11 case would be a “futile and wasted act” and should be denied. *In re Home Network Builders, Inc.*, Case No. 06-3355, 2006 U.S. Dist. LEXIS 89541*, at *10-11 (D.N.J. Nov. 22, 2006). *See In re Ryan*, 267 B.R. 635, 637 (Bankr. N.D. Iowa 2001) (citing *In re Finney*, 992 F.2d 43, 45 (4th Cir. 1993)) (same).

21. With regard to what the Debtor refers to as “complex litigation” in the Motion, all of the litigation pertaining to Property has been appealed to completion with the final

determination being that Biros is the owner. Despite the Debtor's assertions otherwise, there is no remaining residual litigation.

22. Any litigation assets of the estate can be brought by the trustee without issue. Further, there is nothing to preclude the Debtor from assisting the trustee or providing input regarding any such litigation if necessary.

23. Additionally, if the Trustee is responsible for liquidating assets of the estate, including litigating any meritorious claims of the estate, this neutral party will resolve concerns regarding conflicts of interest pertaining to the potential pursuit of actions against certain parties as opposed to others.

24. Due to the circumstances described above, this Case should not be converted and the Debtor's Motion should be denied in its entirety.

II. The Debtor has failed to provide any corporate authority for filing, or converting this Case to, a Chapter 11 case

25. By consenting to the bankruptcy and attempting to proceed with a Chapter 11 case, the Debtor has essentially filed a voluntary bankruptcy case.

26. As such, the local rules require that the Debtor must file a "duly attested resolution authorizing the commencement of the bankruptcy case executed by the body whose approval is required for the commencement of a bankruptcy case under applicable law." W.D.Pa. L.B.R. 1002-10.

27. No such corporate resolution has been filed.

28. Under the applicable statute, authority for a corporation to file a voluntary bankruptcy petition can only be provided by resolution of the corporate board of directors. *See Be-Fit Health & Racquet, Inc. v. Healthtime Racquet & Fitness Club, Inc. (In re Be-Fit Health & Racquet, Inc.)*, Case No. 97-31273F (Bankr. E.D. Pa. Nov. 14, 1997) (relying on 15 Pa. C.S.A. §

1903(a)). The authority to file does not rest with any particular corporate officer. *In re Penny Saver, Inc.*, 15 B.R. 252, 253 (Bankr. E.D. Pa 1981); *see also, e.g., In re American Intern. Industries, Inc.*, 10 B.R. 695 (Bankr. S.D.Fla. 1981); *In re Al-Wyn Food Distributors, Inc.*, 8 B.R. 42 (Bankr. M. D. Fla. 1980).

29. The Debtor has provided no documentation regarding the requisite authority to consent to this bankruptcy or to convert the case to a Chapter 11 case.

30. The schedules filed by the Debtor do not mention a board of directors, shareholders, or include any indication of which parties' authority is required to make decisions on behalf of the corporation.

31. As such, the current documentation provided by the Debtor does not provide the necessary authority to consent to, or convert the Case to a Chapter 11, bankruptcy.

32. Even if the Debtor does file a purported corporate resolution in the future, the Court and the Trustee should carefully consider whether any such resolution is in accordance with the requisite formalities of a corporation in Pennsylvania.

CONCLUSION

33. The right of a debtor to convert a case from Chapter 7 to Chapter 11 is far from absolute and courts routinely deny requests from debtors to convert such cases where the conversion would be futile. Here, it is clear that the conversion would be futile because the facts and circumstances would provide for immediate re-conversion or dismissal for cause under 11 U.S.C. § 1112(b). Further, the lack of corporate authority that is required to consent to the Case raises additional questions regarding whether the Debtor has the ability to consent to the Case, nonetheless request to convert it to Chapter 11.

34. As the Court has acknowledged, this Case is very contentious. It is in the best interest of all of the creditors and the estate for the Trustee to remain in place and for the Case to proceed under Chapter 7 as a conversion will only result in the further depletion of assets of the estate as well as the likely re-conversion or dismissal of that Case.

35. For all of these reasons, the Court should use its discretion to deny the Motion so that the Trustee can efficiently liquidate the estate for the benefit of creditors.

WHEREFORE, the Debtor respectfully requests that this court enter an order (i) denying the Debtor's *Motion of U Lock Inc. to Convert Case from Chapter 7 to Chapter 11* [Doc. No. 53], and (ii) granting such other and further relief as the Court may deem just and proper.

Dated: July 19, 2022

Respectfully submitted,
BERNSTEIN-BURKLEY, P.C.

/s/ Sarah E. Wenrich
Robert S. Bernstein (PA ID No. 34308)
rbernstein@bernsteinlaw.com
Sarah E. Wenrich (PA ID No. 325834)
swenrich@bernsteinlaw.com
601 Grant Street, Floor 9
Pittsburgh, PA 15219
Telephone: (412) 456-8108
Facsimile: (412) 456-8135

Counsel for Christine Biros

**IN THE SUPREME COURT OF PENNSYLVANIA
WESTERN DISTRICT**

CHRISTINE BIROS, AN INDIVIDUAL,	:	No. 259 WAL 2021
	:	
Respondent	:	
	:	
	:	
v.	:	
	:	
	:	
U LOCK INC., A PENNSYLVANIA	:	
CORPORATION,	:	
	:	
Petitioner	:	

ORDER

PER CURIAM

AND NOW, this 16th day of March, 2022, the Application to Stay Remand of Record Pending United States Supreme Court Review is **GRANTED**. Additionally, in accordance with Pa.R.A.P. 2572(d), Petitioner is hereby instructed to pay all accrued and unpaid real estate taxes and to keep such taxes current during the pendency of its occupancy of the Property.

A True Copy Nicole Traini
As Of 03/16/2022

Attest: 
Chief Clerk
Supreme Court of Pennsylvania

Linda Kuchar
Deputy Director

Tim Andrews
Solicitor

Tax Claim Bureau
40 N. Pennsylvania Ave. Suite 109
Greensburg, PA 15601

DATE: 7/19/2022

PAGE 1

TIME: 9:24:35

REAL ESTATE TAX LIEN CERTIFICATE

THIS DOCUMENT CERTIFIES THAT THE TAXES/COSTS DUE ON THE PROPERTY DESCRIBED BELOW, AS SHOWN BY THE RECORDS PROCESSED IN OUR OFFICE AS OF 7/19/22 ARE AS FOLLOWS.

***** DIST/CTL 54 9485 *****

BIROS CHRISTINE
3001 JACKS RUN RD
MC KEESPORT PA 15131

MAP NO 54 03 10 0 103
SITUS 14140 RT 30 E

PROPERTY BLDGS PCL 2
DESC 21.0976 AC
SHANE PLAN

N HUNTINGDON TWP
65650 NORWIN

BOOK/PAGE 0220 3085
LAND USE C

CERT MAIL-R/C 93850165
CERT MAIL-SALE 94372326

STATUS C

ACREAGE 21.097
VALUE 46,410 VALUE C&G 46,410

RECEIPT							BALANCE	INT ADDED		
DATE	CODE	DESCRIPTION	NO	TAX	PENALTY	INTEREST	CHARGES	PAYMENTS	DUE	EACH MO
1/30/18	200	COU-N HUNTINGDON TWP	974.15		97.42	116.96	1188.53			.00
1/30/18	300	CBT-N HUNTINGDON TWP	539.28		53.93	64.64	657.85			.00
1/30/18	400	SCH-NORWIN	3601.42		360.14	432.16	4393.72			.00
2017 TAX TOTAL							6240.10			
1/30/18	201	COU-FILING FEE					45.00			
2/05/18	205	REMINDER COST					.80			
4/03/18	202	POSTAGE RET & CLAIM					5.45			
4/03/18	242	ARCHIVE FEE					4.00			
10/04/18	205	REMINDER COST					.80			
5/07/19	203	RECORD REVIEW FEE					10.00			
5/07/19	206	SALE PREPARATION					25.00			
5/07/19	207	POSTAGE SALE NOTICE					12.00			
2017 FEE TOTAL							103.05			
5/28/19	PAYMENT RECEIVED:		804461					6343.15-		
2017 PAYMENT TOTAL							6343.15-			
2017 YEAR TOTALS & BALANCE							6343.15	6343.15-	.00	

1/22/19	200	COU-N HUNTINGDON TWP	974.15		97.42	29.24	1100.81			.00
1/22/19	300	CBT-N HUNTINGDON TWP	539.28		53.93	16.16	609.37			.00
1/22/19	400	SCH-NORWIN	3712.80		371.28	387.88	4471.96			.00
2018 TAX TOTAL							6182.14			
1/22/19	201	COU-FILING FEE					45.00			
2/28/19	205	REMINDER COST					.85			
4/02/19	242	ARCHIVE FEE					4.00			
4/02/19	202	POSTAGE RET & CLAIM					5.65			
11/01/19	205	REMINDER COST					.80			
6/05/20	203	RECORD REVIEW FEE					10.00			
6/05/20	206	SALE PREPARATION					25.00			
6/05/20	207	POSTAGE SALE NOTICE					12.00			
7/08/20	209	POSTING UPSET SALE					65.00			
7/08/20	210	ADVERTISING					10.00			
8/14/20	220	PROOF OF MAIL FEE					2.00			
2018 FEE TOTAL							180.30			
5/28/19	PAYMENT RECEIVED:		804461					3656.85-		
9/09/20	PAYMENT RECEIVED:		840566					2705.59-		
2018 PAYMENT TOTAL							6362.44-			

DATE	CODE	DESCRIPTION	RECEIPT NO	TAX	PENALTY	INTEREST	CHARGES	PAYMENTS	BALANCE DUE	INT ADDED EACH MO
2018 YEAR TOTALS & BALANCE							6362.44	6362.44-	.00	
1/22/20	200	COU-N HUNTINGDON TWP	974.15		97.42	219.30	1290.87			7.31
1/22/20	300	CBT-N HUNTINGDON TWP	539.28		53.93	121.20	714.41			4.04
1/22/20	400	SCH-NORWIN	3824.18		382.42	860.40	5067.00			28.68
2019 TAX TOTAL							7072.28			
1/22/20	201	COU-FILING FEE					45.00			
2/04/20	205	REMINDER COST					.80			
5/14/20	242	ARCHIVE FEE					4.00			
5/14/20	202	POSTAGE RET & CLAIM					5.80			
5/17/21	203	RECORD REVIEW FEE					10.00			
5/17/21	206	SALE PREPARATION					25.00			
5/17/21	207	POSTAGE SALE NOTICE					12.00			
7/01/21	209	POSTING UPSET SALE					65.00			
7/01/21	210	ADVERTISING					10.00			
8/17/21	220	PROOF OF MAIL FEE					2.00			
2019 FEE TOTAL							179.60			
2019 YEAR TOTALS & BALANCE							7251.88	.00	7251.88	40.03
ESTIMATED BALANCE DUE NEXT MONTH									7291.91	
1/26/21	200	COU-N HUNTINGDON TWP	997.35		99.74	134.64	1231.73			7.48
1/26/21	300	CBT-N HUNTINGDON TWP	542.53		54.25	73.26	670.04			4.07
1/26/21	400	SCH-NORWIN	3935.57		393.56	531.36	4860.49			29.52
2020 TAX TOTAL							6762.26			
1/26/21	201	COU-FILING FEE					45.00			
2/09/21	205	REMINDER COST					.80			
4/13/21	242	ARCHIVE FEE					4.00			
4/14/21	202	POSTAGE RET & CLAIM					5.90			
5/17/22	203	RECORD REVIEW FEE					10.00			
5/17/22	206	SALE PREPARATION					25.00			
5/17/22	207	POSTAGE SALE NOTICE					13.00			
7/01/22	209	POSTING UPSET SALE					65.00			
7/01/22	210	ADVERTISING					12.00			
2020 FEE TOTAL							180.70			
2020 YEAR TOTALS & BALANCE							6942.96	.00	6942.96	41.07
ESTIMATED BALANCE DUE NEXT MONTH									6984.03	
1/19/22	200	COU-N HUNTINGDON TWP	997.35		99.74	44.88	1141.97			7.48
1/19/22	300	CBT-N HUNTINGDON TWP	542.53		54.25	24.42	621.20			4.07
1/19/22	400	SCH-NORWIN	3935.57		393.56	177.12	4506.25			29.52
2021 TAX TOTAL							6269.42			
1/19/22	201	COU-FILING FEE					45.00			
2/10/22	205	REMINDER COST					.85			
4/04/22	242	ARCHIVE FEE					4.00			
4/04/22	202	POSTAGE RET & CLAIM					6.25			
2021 FEE TOTAL							56.10			
2021 YEAR TOTALS & BALANCE							6325.52	.00	6325.52	41.07
ESTIMATED BALANCE DUE NEXT MONTH									6366.59	
CLAIM TOTALS							33225.95	12705.59-	20520.36	122.17
ESTIMATED TOTAL DUE NEXT MONTH									20642.53	
MISC RECEIPTS										
4/23/19	960	LIEN CERTIFICATE	801274						15.00	
5/20/19	960	LIEN CERTIFICATE	803746						15.00	
6/12/19	960	LIEN CERTIFICATE	806067						15.00	
2/10/22	960	LIEN CERTIFICATE	877079						15.00	
4/18/22	960	LIEN CERTIFICATE	883783						15.00	
4/22/22	960	LIEN CERTIFICATE	884304						15.00	
5/17/22	960	LIEN CERTIFICATE	886316						15.00	

***** DIST/CTL 54 9485 *****

Exhibit B Page 3 of 3

PAGE 3

DATE	CODE	DESCRIPTION	RECEIPT NO	TAX	PENALTY	INTEREST	CHARGES	PAYMENTS	BALANCE DUE	INT ADDED EACH MO
5/20/22	960	LIEN CERTIFICATE	886573						15.00	
CREDIT CARD TRANSACTIONS - - - - -										

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
)	BANKRUPTCY NO. 22-20823-GLT
U LOCK INC.)	
)	CHAPTER 7
DEBTOR)	
*****)	DOCUMENT NO.
U LOCK, INC.)	
)	
MOVANT)	
)	HEARING DATE: 8/9/22 @2:00 PM
vs.)	COURTROOM A—PITTSBURGH
)	
CHRISTINE BIROS, SHANNI SNYDER,)	
ROBERT H. SLONE, TRUSTEE, AND)	
UNITED STATES TRUSTEE,)	
)	
RESPONDENTS)	

**RESPONSE OF ROBERT H. SLONE, TRUSTEE TO MOTION OF U LOCK, INC.
TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 11**

AND NOW, comes Robert H. Slone, Trustee, by and through his attorneys, Mahady and Mahady—Robert H. Slone, Esquire, and files this Response to the Motion of U Lock, Inc. to Convert Case from Chapter 7 to Chapter 11, stating as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Through reviewing financial information and other documents provided to the Trustee by the Debtor, the Trustee has determined that such information shows that the Debtor generates very little money from its operation, as follows:
 - a. Official Form 207 shows that from the beginning of the fiscal year to filing date, the Debtor's gross revenue was \$8,400.00.

- b. Upon requesting the Debtor's bank statements, the Trustee received two (2) sets of bank statements from two (2) accounts the Debtor holds at Citizens Bank. Debtor's Citizens Bank checking account ending xxx380-2 appears to be the operating account of the Debtor. The deposits and credits in this account from January 1, 2022 to June 30, 2022 total \$2,610.00. Debtor's second Citizens Bank account ending in xxxx278-5 shows a balance of \$64.00 on the June 2021 statement and a balance of \$31.00 on the May 2022 statement. There were no transactions in this account other than a \$3.00 monthly bank service charge.
- c. Official Form 207 reports Debtor's total gross revenue as \$13,200.00 for the year 2021 and \$12,000.00 for the year 2020.
- d. The amount turned over to the Trustee from the Debtor pursuant to Court Order was the total of \$1,895.00.

14. The Trustee questions the purpose of this case being converted from Chapter 7 to Chapter 11 or why the involuntary petition was not contested.

WHEREFORE, the Trustee respectfully requests that the case of U Lock, Inc. be dismissed.

Respectfully submitted,

Dated: July 19, 2022

/s/ ROBERT H. SLONE
Robert H. Slone, Esquire
PA I.D. No. 19963
MAHADY & MAHADY
223 South Maple Avenue
Greensburg, PA 15601
(724) 834-2990
robertslone223@gmail.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	
)	BANKRUPTCY NO. 22-20823-GLT
U LOCK INC.)	
DEBTOR)	CHAPTER 7
*****)	
U LOCK, INC.)	DOCUMENT NO.
MOVANT)	
)	HEARING DATE: 8/9/22 @2:00 PM
vs.)	COURTROOM A—PITTSBURGH
)	
CHRISTINE BIROS, SHANNI SNYDER,)	
ROBERT H. SLONE, TRUSTEE, AND)	
UNITED STATES TRUSTEE,)	
)	
RESPONDENTS)	

**CERTIFICATE OF SERVICE FOR RESPONSE OF ROBERT H. SLONE, TRUSTEE TO
MOTION OF U LOCK, INC. TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 11**

I certify under penalty of perjury that I served the above captioned pleading(s) on the parties at the addresses specified below on July 19, 2022 by the following:

Service by First-Class Mail:

Office of the U.S. Trustee
Liberty Center, Suite 970
1001 Liberty Avenue
Pittsburgh, PA 15222

Christine Biros
435 Miller Lane
Pittsburgh, PA 15239

Shanni Snyder
14390 Route 30, Unit H
North Huntingdon, PA 15642

J. Allen Roth, Esquire
805 S. Alexandria Street
Latrobe, PA 15650

Sarah Wenrich, Esquire
Bernstein Burkley
707 Grant Street
Suite 2200 Gulf Tower
Pittsburgh, PA 15219

Law Firm of William E. Otto
PO Box 701
Murrysville, PA 15668

EXECUTED ON: July 19, 2022

By: /s/ ROBERT H. SLONE
Robert H. Slone, Esquire
PA I.D. No. 19963
MAHADY & MAHADY
223 South Maple Avenue
Greensburg, PA 15601
(724) 834-2990
robertslone223@gmail.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	
)	BANKRUPTCY NO. 22-20823-GLT
U LOCK INC.)	
DEBTOR)	CHAPTER 7
*****)	
U LOCK, INC.)	DOCUMENT NO.
MOVANT)	
)	HEARING DATE: 8/9/22 @2:00 PM
vs.)	COURTROOM A—PITTSBURGH
)	
CHRISTINE BIROS, SHANNI SNYDER,)	
ROBERT H. SLONE, TRUSTEE, AND)	
UNITED STATES TRUSTEE,)	
)	
RESPONDENTS)	

ORDER OF COURT

AND NOW, to wit, this ____ day of _____ 2022, upon consideration of the Trustee's Response to the Motion of U Lock, Inc. to Convert Case from Chapter 7 to Chapter 11, it is hereby ORDERED, ADJUDGED and DECREED that the above-referenced Chapter 7 case is dismissed without prejudice.

BY THE COURT:

GREGORY L. TADDONIO
UNITED STATES BANKRUPTCY JUDGE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: U LOCK INC. a/k/a)	
U-LOCK INC.)	Bankruptcy 22-20823-GLT
)	
Debtor.)	Chapter 7
)	
-----)	

**EXHIBITS IN SUPPORT OF MOTION TO CONVERT CASE TO CHAPTER 11,
SUBPART V**

The attached exhibits will be referenced at the hearing on the Motion to Convert from Chapter 7 to 11, Subpart V and other matters scheduled for August 9, 2022. These exhibits are being provided in advance pursuant to Paragraph 11 of the General Procedures Established for Cases Assigned to Judge Gregory L. Taddonio.

Respectfully submitted,

/s/ J. Allen Roth, Esq.

J. Allen Roth, Esq. (PA ID 30348)
805 S. Alexandria Street
Latrobe PA 15650
(724) 537-0939
lawmatters@yahoo.com

COUNSEL FOR DEBTOR U LOCK INC.



Renewal of Number

Rewrite of Number

POLICY NUMBER: PAV0389594

1. NAMED INSURED: ULOCK INC
DBA:

MAILING ADDRESS: 14140 STATE ROUTE 30

North Huntingdon, PA 15642

2. POLICY PERIOD: From July 22, 2022 To July 22, 2023 at 12:01 A.M.
Standard Time at your mailing address shown above.

3. FORM OF BUSINESS: Corporation **OTHER DESC:**

4. BUSINESS DESCRIPTION: MINI-WAREHOUSES

IN RETURN FOR THE PAYMENT OF THE PREMIUM, AND SUBJECT TO ALL THE TERMS OF THIS POLICY WE AGREE WITH YOU TO PROVIDE THE INSURANCE AS STATED IN THIS POLICY.

5. THIS POLICY CONSISTS OF THE FOLLOWING COVERAGE PARTS FOR WHICH A PREMIUM IS INDICATED. THIS PREMIUM MAY BE SUBJECT TO ADJUSTMENT.

	PREMIUM
Commercial General Liability Coverage Part	\$ 891.00
Commercial Property Coverage Part	\$ 1,836.00
Commercial Crime Coverage Part	\$ NOT COVERED
Commercial Inland Marine Coverage Part	\$ NOT COVERED
Professional Liability Coverage Part	\$ NOT COVERED
Liquor Liability Coverage Part	\$ NOT COVERED
Commercial Umbrella Coverage Part	\$ NOT COVERED
Owners Contractors Protective Coverage Part	\$ NOT COVERED
TRIA	\$ NOT COVERED
	2,727.00
6. TOTAL PREMIUM PAYABLE AT INCEPTION	\$
Policy Fee	\$ 150.00
Surplus Lines Tax	\$ 80.13
Inspection Fee	\$ 150.00
Stamping Fee	\$ 20.00
	\$
	\$
Other:	\$
TOTAL	\$ 3,127.13

7. FORM(S) AND ENDORSEMENT(S) MADE A PART OF THIS POLICY AT THE TIME OF ISSUE:*

AS PER FORM S1007 (12/2000) SCHEDULE OF FORMS AND ENDORSEMENTS ATTACHED

*Omits applicable Forms and Endorsements if shown in specific Coverage Part/Coverage Form Declarations.

THESE DECLARATIONS TOGETHER WITH THE COMMON POLICY CONDITIONS, COVERAGE PART DECLARATIONS, COVERAGE PART COVERAGE FORM(S) AND FORMS AND ENDORSEMENTS, IF ANY, ISSUED TO FORM A PART THEREOF, COMPLETE THE ABOVE NUMBERED POLICY.

Agency Code: 02714
USG Insurance Services, Inc. - Canonsburg
1000 Town Center Way
Canonsburg, PA 15317
ak 07/25/2022

By

Authorized Representative

S1100(09/2016)

Page 1 of 1

COMMERCIAL LINES COMMON POLICY DECLARATIONS SCHEDULE OF FORMS AND ENDORSEMENTS

POLICY NUMBER:

PAV0389594

NAMED INSURED:

ULOCK INC

Form / Endorsement No. / Edition Date

COMMON POLICY

NAA105	[05-22]	GLOBAL INDEMNITY PRIVACY NOTICE
NAA238	[05-22]	IMPORTANT NOTICE FOR POLICYHOLDERS REGARDING PUBLIC HEALTH EMERGENCY
NAA169	[05-22]	CLAIMS REPORTING PROCEDURES
S1100	[09-16]	PENN-AMERICA COMMON POLICY DECLARATIONS
IL0017	[11-98]	COMMON POLICY CONDITIONS
IL0021	[09-08]	NUCLEAR ENERGY LIABILITY EXCLUSION ENDORSEMENT
IL0120	[10-13]	PA CHANGES - DEFENSE COSTS
IL0910	[07-02]	PA NOTICE
EAA204	[02-15]	PA SERVICE OF SUIT
EAA100	[01-12]	IN WITNESS CLAUSE
EAA146	[12-09]	TERRORISM EXCLUSION
S1003	[08-91]	MINIMUM EARNED PREMIUM
S2003	[08-02]	PA COMBINED PROVISIONS ENDORSEMENT
PA01230	[04-90]	ASBESTOS EXCLUSION
IL0003	[09-08]	CALCULATION OF PREMIUM
IL0985	[12-20]	DISCLOSURE PURSUANT TO TERRORISM RISK INSURANCE ACT
EPA1739	[06-15]	CHANGES - ACTUAL CASH VALUE

COMMERCIAL GENERAL LIABILITY

S2000	[06-01]	GL COVERAGE PART DECLARATIONS
CG0001	[04-13]	CGL COVERAGE FORM
CG2107	[05-14]	EXCLUSION - ACCESS OR DISCLOSURE OF CONFIDENTIAL OR PERSONAL INFORMATION AND DATA-RELATED LIABILITY - LIMITED BODILY INJURY EXCEPTION NOT INCLUDED
CG2109	[06-15]	EXCLUSION - UNMANNED AIRCRAFT
CG2147	[12-07]	EMPLOYMENT RELATED PRACTICES EXCL
CG2155	[09-99]	TOTAL POLLUTION EXCLUSION WITH A HOSTILE FIRE EXCEPTION
CG2132	[05-09]	COMMUNICABLE DISEASE EXCLUSION
CG2167	[12-04]	FUNGI OR BACTERIA EXCLUSION
CG2196	[03-05]	SILICA OR SILICA-RELATED DUST EXCLUSION
CG2229	[11-85]	EXCL - PROPERTY ENTRUSTED
CG2426	[04-13]	AMENDMENT OF INSURED CONTRACT DEFINITION
EPA1631	[01-18]	TOTAL EXCLUSION - PROFESSIONAL SERVICES
EPA1691	[09-12]	ANTI-STACKING ENDORSEMENT
EPA1833	[01-18]	NONCOOPERATION WITH AUDIT
EPA2016	[03-22]	EXCLUSION - CYBER AND DATA LIABILITY
CG4014	[12-19]	CANNABIS EXCLUSION

COMMERCIAL PROPERTY

S3000	[08-09]	COMMERCIAL PROPERTY COVERAGE PART
-------	---------	-----------------------------------

S1007 (12-2000)

Page 1 of 2

**COMMERCIAL LINES COMMON POLICY DECLARATIONS
SCHEDULE OF FORMS AND ENDORSEMENTS**

POLICY NUMBER: PAV0389594	NAMED INSURED: ULOCK INC
-------------------------------------	------------------------------------

Form / Endorsement No. / Edition Date

		DECLARATIONS
CP0010	[10-12]	BUILDING AND PERSONAL PROPERTY COVERAGE FORM
CP0090	[07-88]	COMMERCIAL PROPERTY CONDITIONS
CP0140	[07-06]	EXCLUSION OF LOSS DUE TO VIRUS OR BACTERIA
CP1030	[09-17]	CAUSE OF LOSS - SPECIAL FORM
CP1033	[10-12]	THEFT EXCLUSION
CP1075	[12-20]	CYBER INCIDENT EXCLUSION
CP9903	[12-19]	CANNABIS EXCLUSION
EPA1925	[12-18]	SINKHOLE COLLAPSE EXCLUSION

RESOLUTION OF U LOCK INC.

At a meeting of the shareholders on June 30, 2022, in Westmoreland County, Pennsylvania:

WHEREAS, Shanni Snyder commenced an involuntary bankruptcy under Chapter 7 of the Bankruptcy Court which, because of a lack of defense to the allegation of insolvency, it did not answer, and as the Corporation is insolvent and unable to pay its debts when due,

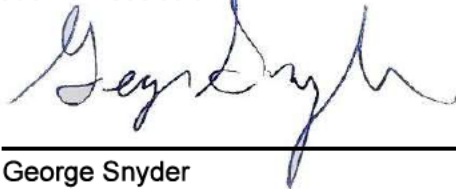
and WHEREAS, the Corporation and its creditors would best be served by reorganization of the Corporation under Chapter 11 of the Bankruptcy Code, Subchapter V, Small Business Recorganization, considering that benefit to the creditors and the Company would be best had by invoking the Pennsylvania Uniform Voidable Transactions Act or similar avoidance and preferential transfer laws available under the bankruptcy code and federal law to void the purported involuntary transfer of U Lock's property, obtain available financing, and pay the creditors in full, it is hereby:

RESOLVED, that the Corporation authorizes as soon as practicable counsel J Allen Roth to convert the case to reorganization pursuant to Chapter 11 of the Bankruptcy Code, Subchapter V, Small Business Reorganization. The Corporation consents to reorganization.

Present: George Snyder 345,000,000 outstanding shares
Kash Snyder 75,000,000 outstanding shares (telephonically)

Quorum: 98.82% of shareholders voting for resolution. 1.18% not present.

The undersigned hereby certifies that he is the custodian of the books and records of U Lock Inc., a corporation duly formed pursuant to the laws of the Commonwealth of Pennsylvania, and that the foregoing is a true record of a resolution duly adopted at a meeting of the shareholders with a quorum present exceeding 98.82% of the outstanding share of U Lock's stock and that said resolution is now in full force and effect without modification or rescission.



George Snyder
Majority shareholder

July 23, 2022

USAAG Systems
[REDACTED]

Glastonbury, CT 06033

J. Allen Roth, Esq.
805 S. Alexandria
Latrobe, PA 15650

Robert Slone, Esq.
223 South Maple Avenue
Greensburg, PA 15601

In re: U Lock, No. 22-20823 (Bk. W.D. Pa.)

Gentlemen,

I have visited the U Lock site several times over the past few years and am familiar with the location and property.

I am aware that USAAG has tentatively agreed to inject sufficient capital into U Lock Inc. to allow it to pay off all of its creditors the amounts they are due in full pursuant to a prospective bankruptcy plan.

In the event the United States Bankruptcy Court for the Western District of Pennsylvania allows U Lock Inc. to reorganize and to secure its assets lien free, I will accept the position as President of U Lock Inc.

Through my experience as a former Mayor of West Warwick, Rhode Island, a town with almost the exact population as North Huntingdon, Pennsylvania, along with other governmental and real estate experience, I believe U Lock can become prosperous fairly quickly. Under my guidance and direction, U Lock will be debt free, supervised, compliant, and profitable.

Yours truly,



J. Michael Levesque

J. Michael Levesque

Warwick, RI 02886
USA

PERSONAL

Born [REDACTED], 1953
Kent County Memorial Hospital – Warwick, RI
Son of Arthur A. and Gloria (Paull) Levesque (Deceased)
Married to the former Celeste A. Vanasse and father of three children: Lindsay-Mae; July 1, 1977, Zachary Paull; August 11, 1980 and Aubrey Elizabeth; July 28, 1989

EDUCATION

1975	Bachelor of Arts Degree – Political Science St. Michael's College, Colchester, Vermont
1971	High School Diploma – College Preparatory Bishop Hendricken High School, Warwick, RI 02886
1967	Grammar School St. James School, West Warwick, RI 02893

ORGANIZATIONS

Involved in a wide range of civic organizations as well as fundraising activities for community-based organizations.
Licensed Real Estate Agent
Notary Public
Newspaper columnist and Associate Publisher of The Rhode Island Echo
Political Analyst for WJAR-TV on occasion

POLITICAL AND GOVERNMENTAL OFFICES AND AFFILIATIONS

2020+	BOARD MEMBER	RI Heritage Hall of Fame
2015	BOARD MEMBER	NE Group Foundation
2015	MEMBER	Station Fire Advisory Committee
2013	CO-CHAIRMAN	West Warwick Centennial Ball
1998-2006	CO-FOUNDER	Narragansett Indian Casino Drive
1998-2002	CO-CHAIR	West Warwick 2000
1990-1992	MEMBER	Children's Crusade Board
1986-1992	MEMBER	Industry-Education-Labor Council of RI
1986-1987	MEMBER	RI Adult Education Literacy Council
1986-1987	MEMBER	RI Strike Force for Literacy
1979-1998	MEMBER	West Warwick GOP Committee
1986-1988	MEMBER	Republican National Committee
1986	DELEGATE	White House Conference on Business
1985-1986	CHAIRMAN	West Warwick Charter Commission

1982-1984	MEMBER	West Warwick Town Council
1980	MEMBER	Davies Vocational School Advisory
1980	CHAIRMAN	RIGOP Energy Commission
1979	CHAIRMAN	West Warwick Alternate Tax Committee
1977	MEMBER	West Warwick Charter Review Committee

SPECIAL AWARDS

1991-1992	PRESIDENTIAL APPOINTMENT	Reappointed by President Bush to the National Commission for Employment Policy
1990	PRESIDENTIAL APPOINTMENT	Appointed by President Bush to the United States Presidential Observer Delegation to the National elections in Haiti
1989-1991	PRESIDENTIAL APPOINTMENT	Appointed by President Reagan to the National Commission for Employment Policy
1986	PRESIDENTIAL APPOINTMENT	Appointed by President Reagan as a Presidential Delegate (100 Nationwide) to the White House Conference on Small Business

AWARDS/HONORS

Various awards and honors from a variety of professional, governmental and civic organizations.

EMPLOYMENT

2012-Present	PRINCIPAL	XM AMERICAS MANAGEMENT, LLC. 378 Main Street, East Greenwich, RI 02818 A principal in this company that is contracted to expand a major money remittance company based in the Middle East into the Americas and the Caribbean.
2007-Present	PRINCIPAL	CHURCHILL LINCOLN INTERNATIONAL, LLC. 378 Main Street, East Greenwich, RI 02818 A principal in this company that brings a wide range of companies, in a cross section of fields, to do business in the Middle East and North Africa. Clients include major entertainment, construction related and financial companies, as well as North American companies in the energy business.
2003-Present	PRINCIPAL	THE LINCOLN GROUP, LLC. 461 Main Street, East Greenwich, RI 02818 Business consultant for various companies in a wide variety of fields.

Clients include companies involved in gaming, energy, solid waste management, construction, manufacturing, and government service, both domestically and internationally.

- 2001-2005 DIRECTOR OF BUSINESS DEVELOPMENT
O. AHLBORG & SONS, INC.
48 Molter Street, Cranston, RI 02910
Responsible for all business development and public affairs for this large Rhode Island based construction company.
- 1996-1998 VICE PRESIDENT
CARDINAL INTERNATIONAL TRADE, LTD.
17 Industrial Drive, Smithfield, RI 02917
Involved in all areas of this international trade company whose main focus was on the manufacture, sale and distribution of Nicaraguan cigars. Duties included extensive travel throughout Latin America.
- 1993-1996 PRESIDENT
LEVESQUE ASSOCIATES, LTD.
920 Main Street, Coventry, RI 02816
A small consulting firm with an emphasis on privatization programs for developing countries in Latin America and the Pacific Rim.
- 1988-1992 MAYOR
TOWN OF WEST WARWICK, RHODE ISLAND
Was the first Mayor elected in the Town's history. Served two terms before accepting the Party's nomination to be a candidate for the office of Governor.
- 1987-1988 CHAIRMAN
RHODE ISLAND REPUBLICAN PARTY
Elected unanimously by the Rhode Island Republican State Central Committee to oversee Party activities.
- 1987 DIRECTOR
RHODE ISLAND DIVISION OF JOB DEVELOPMENT AND TRAINING/STATE JTPA LIASON
Responsible for the administration of all areas of the federally funded Job Training Partnership Act for the State of Rhode Island. Served also as liason to the United States Department of Labor.
- 1977-1985 VICE PRESIDENT
CRYSTALITE EMBEDMENTS, INC.
6 Industrial Drive, Smithfield, RI 02917
Concerned with all areas of this plastic manufacturing corporation. Duties included extensive travel throughout the US and Canada.



July 23, 2022

J. Allen Roth, Esq.
805 S. Alexandria
Latrobe, PA 15650

Robert Slone, Esq.
223 South Maple Avenue
Greensburg, PA 15601

In re: U Lock, No. 22-20823 (Bk. W.D.Pa.)

Dear Mr. Roth and Mr. Slone:

In the event U Lock Inc. was able to reorganize and regain control of its assets through payment in full to its creditors, I would be pleased to participate on the Board of Directors of the reorganized enterprise.

I did visit U Lock Inc. in Pennsylvania, met with George Snyder, and familiarized myself with the area and potential development opportunities. Through my experience and understanding of real estate, I can assist U Lock in its successful development.

Very truly yours,

DP

Don Parsons

cc: USAAG

DON PARSONS

[REDACTED]
don@98co[REDACTED].n
[REDACTED]

PROFILE

With the ability to make unbiased decisions, manage numbers, and keep healthy percentage of profit for each company, Don has proven his ability to multi-task and complete the task at hand

EXPERIENCE

Designated Broker/Owner, Cullinan Real Estate, Newport, RI — 2020-Present

Cullinan burst onto the luxury marketplace in 2020 and has proven to become a threat to real estate agencies with more than 100 years of experience. Cullinan is a luxury real estate brand created to market and sell the most exclusive homes throughout the country. Currently preparing listings in RI, CA, CT, NY, PA, and WV, this company is destined to become the top luxury brand in country. Cullinan Real Estate has already acquired a portfolio of listings from top real estate developers throughout the country.

Owner, Anytime Realty, Johnston, RI — 2014-Present

Within seven years of its conception, Anytime Realty has grown to one of the top real estate firms in the state and specializes in residential and commercial brokerage with a staff of twenty plus seasoned agents. A healthy percentage of profit margin, and the ability to think on the fly and adjust with the changing market has allowed Anytime Realty to continue to be ranked highly in sales and customer service statistics.

Owner, Moe's Moving & Storage, Smithfield, RI — 2020- Present

Since its conception, Moe's Moving has grown from a single crew operation to a robust fleet of top of the line moving vehicles, and crew. Moe's Moving has swiftly become the exclusive mover of many professional athletes, celebrities and top producing real estate agents, and has successfully completed long distance and local moves for thousands of clients. Currently holding licenses throughout the US and in RI, MA, CT, NH, and FL, Moe's Moving has the ability to grow. Moe's operates a state of the art warehouse facility and with the current staff and crew in place, Moe's Moving has over 30 years of combined experience and expertise in the moving and storage industry.

Owner, Pure Water Transport, Coventry, RI — 2021-Present

Acquired with 50 years of business knowledge and experience as the top water transport company within the state of Rhode Island, Pure Water

Transport is currently operating in RI, MA and CT. With new management and an updated fleet of trucks, Pure Water Transport is poised to be the exclusive water transport company in the tri-state area.

Keynote Speaker, Bryant University and Providence College — Present

Over the last decade, Don has been an honored guest at some of the most prestigious business colleges throughout Rhode Island as a keynote speaker. With a passion for education and entrepreneurship, his speeches have inspired and lead young business professionals to greatness. As a mentor, Don has taken a serious role in the education of up and coming entrepreneurs.

EDUCATION AND ACCOLADES

Greater Providence Board of REALTORS — President, 2020

Greater Providence Board of REALTORS — REALTOR of the year, 2017

Rhode Island Association of REALTORS- Board of Directors

Greater Providence Board of REALTORS — Board of Directors

Make-A-Wish Board of Directors

Bryant University, Leadership Excellence Certificate Program, 2019

National Association of REALTORS — Certified Instructor

Rhode Island Association of REALTORS — Certified Instructor

SKILLS

Don brings to the table the ability to take a hands on approach in the management of multiple businesses. He also possesses a large network of connections including politicians, business owners, and entrepreneurs. With extensive experience in marketing and negotiations, he is able to lead a company to success. The ability to adapt with movement in the markets has allowed Don to grow each business substantially. He possesses an international reach with contacts in the Middle East, and throughout the country including major key cities such as Boston, New York, Miami, Los Angeles, Aspen and Houston.

USAAG SYSTEMS CO
[REDACTED]
GLASTONBURY CT [REDACTED]
[REDACTED]

July 12, 2022

J. Allen Roth, Esq.
805 S. Alexandria Street
Latrobe PA 15650

In re: Confidential Letter of Intent
14140 U.S. 30, North Huntingdon, Pennsylvania

Dear Mr. Roth:

USAAG Systems Co. is an accredited investor. It has fully reviewed the *U Lock* bankruptcy matter along with certain lawsuits filed in the Court of Common Pleas of Westmoreland County.

USAAG Systems Co. is willing to infuse the capital necessary for U Lock to either emerge from bankruptcy or have its bankruptcy dismissed,, satisfy the unsecured loan Ms. Biros provided to U Lock Inc. along with fair interest. We would provide the seed money and assistance for U Lock to either develop the property or enter into a joint venture to develop the property. USAAG Systems Co. would expect to receive at least a seventy-five percent (75%) equity stake in U Lock Inc. to do so.

Alternatively, USAAG Systems Co. is willing to provide U Lock a mortgage to pay Ms. Biros the funds along with interest. USAAG would provide terms and guidance for U Lock to enable U Lock to develop the property.

However, as USAAG Systems Co. must be able to provide U Lock with seed capital and cover other expenses, this Letter of Intent is contingent upon Ms. Biros receiving no more than the actual amount she provided, any property taxes she paid between 2015 and present, along with the capped Pennsylvania simple interest rate of six percent (6%). *Furthermore, we cannot consider compensation to Ms. Biros for the current remediation activities without first evaluating a site plan.*

Finally, we note our extreme concern relating to the dumping or development activities occurring on the property. If it is found that these current activities caused significant environmental damage or would materially increase the costs of simple remediation, we reserve the right to modify or rescind this offer.

The funds earmarked for this project are liquid, deposited in an FDIC insured bank, and ready to be transmitted to escrow or the bankruptcy trustee forthwith.

Very truly yours,

[REDACTED]
Dave Carter
Vice President

---Allen and George:

This plan is flexible. We could infuse the entire amount owed to all creditors including the Christine Biros unsecured loan and the Shanni Snyder judgment so long as its capped at what they are entitled to-- federal prejudgment or post-judgment. In this case, based on calculations, we'd ask for 80% of the reorganized enterprise and the existing shareholders receive 20%. We'd guide the reorganized company to develop nicely with Mike Levesque and Don Parsons on board.

--Dave

US702 | BR002
ROP 450
P.O. Box 7000
Providence, RI 02940

Savings Account Statement

Page 1 of 3

Beginning July 01, 2022
through July 31, 2022

Questions? Contact us today:

USA AG SYSTEMS CO

GLASTONBURY CT



CALL:
Savings Account Customer
Service
1-800-922-9999



VISIT:
Access your account online:
citizensbank.com



MAIL:
Citizens
Customer Service Center
P.O. Box 42001
Providence, RI 02940-2001

USA AG SYSTEMS CO

Business Savings for

Balance Calculation

Previous Balance		850,808.47
Withdrawals & Debits	-	499.00
Deposits & Credit	+	.00
Interest Paid	+	7.22
Current Balance	=	850,316.69

Balance

Average Daily Balance	850,373.85
Interest	
Current Interest Rate	.01%
Annual Percentage Yield Earned	.01%
Number of Days Interest Earned	31
Interest Earned	7.22
Interest Paid This Year	19.97

You can waive the monthly maintenance fee of \$4.99 by maintaining a minimum daily balance of \$500 in your account.

Your minimum daily balance used to qualify this statement period is: \$850,309

A New Account waiver is active on your account so monthly maintenance fees are not currently being assessed. Your first four monthly maintenance fees will be waived as a courtesy.

TRANSACTION DETAILS FOR SAVINGS ACCOUNT ENDING 6498

<i>Date</i>	<i>Amount</i>	<i>Description</i>	<i>Previous Balance</i>
07/05	499.00	ONLINE TRANSFER TO CHECKING 0024996386	850,808.47
07/29	7.22	Interest	
			Total Transactions
			- 491.78

Please See Additional Information on Next Page

Business Savings

Daily Balance						Current Balance	
Date	Balance	Date	Balance	Date	Balance	=	850,316.69
07/05	850,309.47	07/29	850,316.69				

NEWS FROM CITIZENS

Why wait for a statement to see your banking activity? Download our Mobile Banking App* today to see your account info when it is convenient for you. Plus, better manage your money with personalized insights in the app to better balance spending and saving.

*Wireless carrier charges may apply.



APPENDIX A079



GARBAGE PUSHED IN MANHOLE



PILE CREATED DURING SO-CALLED REMEDIATION PROCESS (STILL THERE)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

8/10/22 11:19 am
CLERK
U.S. BANKRUPTCY
COURT - WDPA

In re: : Case No.: 22-20823-GLT
: Chapter: 7
U LOCK INC :
: Date: 8/9/2022
Debtor(s). : Time: 02:00

PROCEEDING MEMO

MATTER:

- # 14 Can't Expedited Motion to Dismiss Case , in addition to Motion For Sanctions Against Petitioning Creditor, or in the alternative Motion for Relief from Stay or in the alternative Motion to Abandon the Movants Property.
- # 36 - Order Granting Christine Biros Limited Relief from the Stay
- # 86 - Notice Regarding Non-Compliance as Directed by Paragraph 12 of the Order at Entry 36 filed by Debtor
 - # 96 - Response filed by Robert Slone, Trustee
 - # 97 - Response filed by Christine Biros
- # 100 - Declaration re: Notice of Non-Compliance Docket Entry 86 filed by Debtor
- # 53 Motion to Convert Case from Chapter 7 to 11 filed by the Debtor
 - # 91 - Response filed by Christine Biros
 - # 92 - Response filed by Trustee Slone
- # 102 - Exhibits to be referenced at hearing on 8/9/22 filed by the Debtor

APPEARANCES:

Debtor: J. Allen Roth, George Snyder
Trustee: Robert H. Slone
Petitioning Creditor: Shanni Snyder, Charles Zebley
Christine Biros: Sarah Wenrich, William Otto, Christine Biros

NOTES: [2:16 p.m.]

Slone: So far, I've received \$1,895 from the Debtor. I have received bank statements that show gross revenue \$6,210, which is inconsistent with the Schedules. There are a limited number of assets in the Debtor's possession. After reviewing the pleadings, I have directed the tenants to pay rent to me. The problem is that there are no leases in place, so it is difficult to enforce the payment obligations. No tax returns have been filed since the business's formation.

Court: I received a declaration from Mr. Snyder that indicated property removed from the Debtor's site.

Slone: Tenants have removed some of their personal property from the lockers. Most equipment listed in the Debtor's Schedules are not in operating condition. I took someone to examine the property and there is no expectation that an auction would generate funds.

Court: On the notice of non-compliance, there is an allegation that certain property has been destroyed.

Slone: Limited remediation has taken place. I don't believe there have been other issues.

Roth: The non-compliance related to an attempt to collect against the Debtor even after the bankruptcy was filed.

Court: You're talking about your adversary proceeding. Are there any outstanding issues with the cease-and-desist letter?

Roth: No.

Court: I am going to consider the notice as withdrawn. To the extent there are issues involving access to the property or interference with the debtor's estate, the chapter 7 trustee is equipped to handle it, and if not, to bring it to the Court's attention.

S. Snyder: I have something to say about the transparency of the process with creditors.

Court: You haven't filed a response to the notice of non-compliance, so I'm not sure you have standing.

Roth: [Delivers argument in favor of motion to convert].

Court: Have you discussed any case precedent with the trustee, or with the construction trustee Slone?

Court: And you believe that there is case law that support you to collaterally attack the constructive trust? You can get over *Rooker-Feldman* and *res judicata* issues?

Roth: Yes. We believe the prior transfer is voidable.

Court: And how is this a viable business, even with the infusion of new money? What would be the reorganization purpose for this entity?

Roth: The property is probably worth at least \$1 million.

Court: If there is a viable claim to attack the constructive trust, why can't the trustee initiate that action?

Roth: We think we can handle those efforts.

Slone: I don't believe conversion would accomplish anything.

Wenrich: The real property belongs to Ms. Biros. Any reorganization purpose relies on the real property. We also raise issue with the authenticity of exhibits filed by the Debtor.

Court: [Delivers ruling on the motion to convert]. I will deny the Debtor's motion to convert. Moving to the adversary proceedings, it's the respective trustees/ that should initiate those actions. Have you had any conversation with the trustee?

Roth: I have not.

Slone: I have no interest in pursuing a stay violation action.

Court: I actually have three parties before me that may have violated the stay.

Otto: If you look at the state court docket, I did not act on the writ of possession that was issued by the state judge. I brought a sanctions action against Mr. Snyder and Mr. Roth individually as opposed to the Debtor.

Court: I am inclined to dismiss the stay violation adversary proceeding because it was brought on behalf of U Lock, and only the trustee can bring such action unless derivative standing is obtained. I will also deny the motion to intervene by Ms. Snyder. This is a claim belonging to her bankruptcy estate.

Zebley: There is a meeting of creditors on Friday. I believe Ms. Snyder has a pre-petition claim against the Debtor.

Court: I am also inclined to dismiss Ms. Snyder's adversary proceeding. I will keep the motion to dismiss open.

OUTCOME:

1. The *Motion to Convert Case from Chapter 7 to 11* [Dkt. No. 53] is DENIED for the reasons stated on the record. [Text Order].
2. The *Notice Regarding Non-Compliance as Directed by Paragraph 12 of the Order at Entry 36* [Dkt. No. 86] is DENIED as WITHDRAWN. [Text Order].
3. The Adversary Proceeding (22-2048-GLT) [Dkt. No. 104] is DISMISSED without prejudice for the reasons stated on the record.
4. The the Motion for Leave to Intervene or Join, in addition to Motion to Add Party [Dkt. No. 3] in adversary 22-2048 is DENIED without prejudice as the underlying adversary is dismissed. [Text Order].
4. The Adversary Proceeding (22-02052-GLT) [Dkt. No. 105] is DISMISSED without prejudice for the reasons stated on the record.
5. On or before August 23, 2022, the trustee shall file a status report. [Text Order].
6. The *Con't Expedited Motion to Dismiss Case, in addition to Motion For Sanctions Motion to Abandon the Movants Property Against Petitioning Creditor; or in the alternative Motion for Relief from Stay or in the alternative Motion to Abandon the Movants Property* [Dkt. No. 14] is CONTINUED to August 25, 2022 at 11:30 a.m. [Text Order].

DATED: 8/9/2022

FILED
8/15/22 3:34 pm
CLERK
U.S. BANKRUPTCY
COURT - WDPA

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

IN RE: . Case No. 22-20823-GLT
. .
. .
U LOCK INC, . 5414 U.S. Steel Tower
. 600 Grant Street
. Pittsburgh, PA 15219
Debtor. .
. August 9, 2022
. 2:14 p.m.

TRANSCRIPT OF [#14] CONTINUED EXPEDITED MOTION TO DISMISS CASE,
IN ADDITION TO MOTION FOR SANCTIONS AGAINST PETITIONING
CREDITOR, OR IN THE ALTERNATIVE MOTION FOR RELIEF FROM STAY, OR
IN THE ALTERNATIVE MOTION TO ABANDON THE MOVANTS PROPERTY;
[#36] ORDER GRANTING CHRISTINE BIROS LIMITED RELIEF FROM THE
STAY; [#86] NOTICE REGARDING NON-COMPLIANCE AS DIRECTED BY
PARAGRAPH 12 OF THE ORDER AT ENTRY 36; [#53] MOTION TO CONVERT
CASE FROM CHAPTER 7 TO 11; [#102] EXHIBITS TO BE REFERENCED AT
HEARING ON 8/9/22
BEFORE HONORABLE GREGORY L. TADDONIO
UNITED STATES BANKRUPTCY COURT JUDGE

APPEARANCES:

For the Debtor: Law Office of J. Allen Roth
By: J. ALLEN ROTH, ESQ.
805 S Alexandria Street
Latrobe, PA 15650

For Christine Biros: Bernstein-Burkley, P.C.
By: SARAH ELIZABETH WENRICH, ESQ.
601 Grant Street, 9th Floor
Pittsburgh, PA 15219

ECRO: Hayley Smith

Proceedings recorded by electronic sound recording, transcript
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APPEARANCES (Cont'd):

For Christine Biros in The Law Firm of William E. Otto
the State Court Action: By: WILLIAM E. OTTO, ESQ.
P.O. Box 701
Murrysville, PA 15668

For Shanni Snyder, By: SHANNI SNYDER, PRO SE
Petitioning Creditor: 14390 Route 30, Unit H
North Huntingdon, PA 15642

TELEPHONIC APPEARANCES:

Chapter 7 Trustee: Mahady & Mahady
By: ROBERT H. SLONE, Trustee
223 South Maple Avenue
Greensburg, PA 15601

Chapter 7 Trustee for Zebley Mehalov & White, P.C.
Shanni Snyder acting as By: CHARLES O. ZEBLEY, JR., ESQ.
Creditor: P.O. Box 2124
Uniontown, PA 15401

- - -

1 THE COURT: All right. The next matter is Case
2 Number 22-20823, U LOCK INC.

3 I'm going to take appearances first here in the --
4 I'll start over here, appearances for the debtor.

5 MR. ROTH: I'm sorry.

6 THE COURT: Would you like to enter your appearance,
7 please?

8 MR. ROTH: Allen Roth on behalf of debtor. Good
9 afternoon.

10 THE COURT: And this is Mr. Snyder?

11 MR. SNYDER: Yes, it is.

12 THE COURT: All right. Good afternoon.

13 MS. SNYDER: Shanni Snyder for myself. Your Honor,
14 would you like us to keep masks on, or are they okay off?

15 THE COURT: If you're comfortable, you can remove
16 them, as long as you're distant from everyone else.

17 MS. SNYDER: Thank you, Your Honor.

18 THE COURT: All right. I'll take appearances over
19 here.

20 MS. WENRICH: Hi, Your Honor. Sarah Wenrich here on
21 behalf of Christine Biros. I'm also here with Ms. Biros, as
22 well as William Otto.

23 THE COURT: All right. Good afternoon. All right.
24 Let me take appearances by video, please.

25 MR. SLONE: Robert Slone, Chapter 7 Trustee for

1 U LOCK.

2 THE COURT: Good afternoon.

3 MR. ZEBLEY: Your Honor, Charles Zebley. I'm the
4 Chapter 7 Trustee for Shanni Snyder. We would be here as a
5 creditor.

6 THE COURT: All right. Good afternoon. Any other
7 appearances on the Zoom call?

8 (No audible response)

9 THE COURT: All right. We are here on a number of
10 matters. I have a continued hearing on the expedited motion to
11 dismiss the case, or in addition for sanctions against the
12 petitioning creditor, or a motion for relief from stay filed by
13 Christine Biros.

14 I have a notice regarding a non-compliance with my
15 order granting limited stay relief that was filed by U LOCK at
16 Docket Number 86.

17 In addition, this is also the time set for the
18 hearing on the motion to convert the case from Chapter 7 to
19 Chapter 11 filed by the debtor, U LOCK, and I have responses in
20 opposition by Christine Biros and Trustee Slone.

21 And last, but not least, I think it's worth noting
22 that I have two adversary proceedings that were filed, as well;
23 an Adversary Number 22-2048 by U LOCK against Christine Biros
24 for a stay violation, as well as an Adversary Number 22-2052,
25 which was by Shanni Snyder against U LOCK for a declaratory

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1 judgment. I also have a motion to intervene filed by Ms.
2 Snyder in Adversary 22-2048.

3 So, you have all kept yourselves quite busy since we
4 were last together, and I have a number of items to tend to,
5 and I think we will need to go through them with some care.
6 But let me first get an update from the Chapter 7 Trustee, Mr.
7 Slone, on where things are from his perspective, and then I
8 want to get into the notice of non-compliance. Trustee Slone.

9 MR. SLONE: Can you hear me?

10 THE COURT: I can.

11 MR. SLONE: Your Honor, so far I've received from the
12 debtor \$1895. That was the monies that they had from different
13 rents, et cetera, some sales. That money has been deposited.

14 I also got all the bank statements for the January 1,
15 2022 to June 30, 2022, and it shows the gross deposits of
16 \$2,610, and that's for the six-month period, Your Honor.

17 The bankruptcy schedule said that the gross revenue
18 was \$8,400. I don't know where the other money was, or is.
19 The -- also, the Official Form 207 reports the gross revenues
20 for 2021 at 13,200, and the year 2020 at 12,000. So, it's not
21 a lot of business being handled in this case, Your Honor.

22 I've taken Mr. Mark Ferry, an auctioneer and
23 liquidator, down to the site. We went through with George
24 Snyder, looked at all the assets. The amount of assets that
25 are owned, or claimed to be owned, by U LOCK at this time is

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1 not a lot, Your Honor. In fact, Mr. Ferry would not conduct an
2 auction down there, and he thought the best thing to do would
3 be to get a surplus guy down there to hunt for the metal.
4 There's not a lot of value there at this time, Your Honor.

5 In looking at a lot of the pleadings that were filed,
6 I've sent letters out to all the people that had rented down
7 there asking them to pay money, what monies that they owed,
8 which were according to the information I received from U LOCK.

9 Now, the one problem is, there are no leases, and
10 little or no records for me to enforce any of these. So, I've
11 asked the people to pay. I haven't received any monies over
12 the last three or four weeks from any of these people. I don't
13 know how I would go about trying to prove my case, Your Honor,
14 at this point.

15 Basically, that's what's happened so far. Also, no
16 tax returns have been filed since the company was formed in
17 2015. So, that's another difficulty that we had.

18 THE COURT: I received a declaration today that was
19 filed by Mr. Snyder that suggested that there was property
20 being removed from the site. Are you aware of anything like
21 that?

22 MR. SLONE: There may have -- I didn't receive that.
23 There was a -- I got a paper and met with George -- or Glenn
24 Mowry (phonetic) who had equipment down there. I showed him
25 the list of what belonged to U LOCK, and he's debating whether

1 some of that is his equipment or not, Your Honor. I told him
2 that he would have to get me some type of proof to show what
3 was his, and told him not to take anything off the property,
4 Your Honor.

5 Some of the other people who rent may have taken some
6 of their items out of their lockers, Your Honor.

7 THE COURT: Out of the storage lockers?

8 MR. SLONE: Yes.

9 THE COURT: Okay. But what about debtor assets that
10 would have some value, have those been secured, or are they --
11 I mean, I guess you're telling me there is no assets with any
12 significant value?

13 MR. SLONE: That's what Mr. Ferry concluded, Your
14 Honor.

15 THE COURT: So, the -- some of these assets that are
16 listed in this declaration, excavator, or trailer, these items
17 don't have --

18 MR. SLONE: All the items that were --

19 THE COURT: -- a fork truck?

20 MR. SLONE: All the items that were listed in their
21 schedules, plus the additional items that we looked over, most
22 are not in any type of operating condition, Your Honor, and Mr.
23 Ferry felt that they weren't worth a lot. All these items were
24 out in the open, basically. There's 20 some acres there.

25 THE COURT: Okay.

1 MR. SLONE: And they were spread over the -- over
2 those acreage.

3 THE COURT: All right. Thank you. All right. Well,
4 let me go back to this notice of non-compliance. You know,
5 there's an allegation that there's been destruction of
6 scheduled property and a cease and desist letter. Is there any
7 concerns that the Trustee wishes to raise to the Court that I
8 should be aware of in terms of what's going on with the
9 property there?

10 MR. SLONE: Well, there are -- there were some
11 limited remediation efforts being taken by the Biros people as
12 per the prior order of Court. Apparently, they needed
13 something from the Township to go forward, and I believe
14 they've gotten that permission from the Township, but the Biros
15 attorney could further address that, Your Honor, but I don't
16 believe there's any other issues.

17 THE COURT: All right. Well, let me go to Mr. Roth.
18 You filed this notice regarding non-compliance. I've got a
19 Chapter 7 Trustee who's -- has oversight over the estate assets
20 at this point, has not indicated an issue with anything that's
21 gone on at this point. Why should I consider anything over and
22 above that at this stage?

23 MR. ROTH: I'm sorry. I had trouble hearing the last
24 thing you said.

25 THE COURT: What are you attempting to raise with the

1 Court at this point with respect to the notice of non-
2 compliance?

3 MR. ROTH: Well, Your Honor, the non-compliance I
4 think had to do with what was going on in the court
5 proceedings, and they were continuing to try to collect even
6 after the bankruptcy was filed, and we believe that they
7 violated --

8 THE COURT: Collect what?

9 MR. ROTH: What's that?

10 THE COURT: Collect what?

11 MR. ROTH: Well, they went into court proceedings
12 asking to get funds and to get transfers made to them by the
13 State Court even after we filed this.

14 THE COURT: Okay. You're talking about your
15 adversary proceeding. I'm talking about you filed a notice of
16 non-compliance suggesting that Ms. Biros was violating the stay
17 relief order with respect to the Phase I testing, and you
18 referenced a cease and desist letter that was issued by North
19 Huntingdon Township. Is there any outstanding or remaining
20 issues that pertain to that at this point?

21 MR. ROTH: Could I ask my client that?

22 THE COURT: Well, I mean, you're counsel for the
23 debtor, and you're the one that filed it, so I'm assuming
24 you're up to speed on this.

25 MR. ROTH: I understand. At this point I don't think

1 there's anything to argue there.

2 THE COURT: All right. All right. Well, then I'm
3 going to consider the notice to be addressed and withdrawn at
4 this point. If there is a further issue -- I mean, all the
5 issues raised in the notice of non-compliance are issues that
6 if they are a problem, I expect the Trustee to raise to my
7 attention as the estate fiduciary.

8 I'm satisfied with the report I received from Mr.
9 Slone today that he's on top of things, that he's examined the
10 property, he's found that there's nothing to secure at this
11 point. But if there is something in the future, I expect him
12 to raise that with me at this point. So, that's going to
13 address that item at this point. Let's get into --

14 MS. SNYDER: May I speak as a creditor, as well?

15 THE COURT: Well, you did not file anything with
16 respect to the notice of non-compliance, so I don't know that
17 you have any standing to raise anything with that at this
18 point.

19 MS. SNYDER: But the creditors -- there's no
20 transparency with the creditors because Ms. Biros is implying
21 that the Trustee granted her permission to destroy the
22 scheduled tanks, and I think a motion to abandon it should be
23 required first.

24 THE COURT: Well, it may very well be that the
25 Trustee does file a motion to abandon, but at this point, if

1 you've got an issue with the way Mr. Slone is administering the
2 estate, you can raise that with me, but at this point I'm --
3 I've received the representation that he's examined the
4 property. He does not find that there's anything there that is
5 worth protecting at this point, and he also -- I'm not hearing
6 anything of any substance to suggest that there is property
7 that's being destroyed to the point that that would have an
8 adverse impact on the estate.

9 MR. ROTH: Judge, can I add something here?

10 THE COURT: All right. What is it?

11 MR. ROTH: Well, under the guise of remediation, what
12 they were doing is, they were destroying things and destroying
13 items that could have some value to U LOCK, and that's what we
14 didn't want to see happening.

15 THE COURT: All right. Well, you heard Trustee Slone
16 say that he brought an expert onto the property. He did not
17 find anyone -- anything there with any value, other than
18 perhaps scrap value.

19 MR. ROTH: Okay.

20 THE COURT: Do you have reason to believe that there
21 is an asset there that could be sold for more than what scrap
22 value would be?

23 MR. ROTH: Well, my client tells me there is, but I'm
24 not sure what that is. Could we have him testify?

25 THE COURT: I'm not going to get into that today, but

1 --

2 MR. ROTH: Okay.

3 THE COURT: -- I just need to get an overview on some
4 of this stuff because there's a number of issues that I need to
5 address. I'm holding back right now on where I am on some of
6 this because I just -- I -- this is not going down the path
7 that it should be going down, and I am completely surprised at
8 the actions I've been seeing some of these parties taking here
9 in light of -- well, I'll leave it at that.

10 Let me hear about the motion to convert from a 7 to
11 11. This is your motion, Mr. Roth -- I'm sorry. Mr. Roth.

12 MR. ROTH: I'm sorry. I couldn't quite hear that
13 again. I'm sorry.

14 THE COURT: You can begin the presentation of your
15 motion to convert from Chapter 7 to Chapter 11.

16 MR. ROTH: Motion to what? I'm sorry.

17 THE COURT: You filed a motion to convert.

18 MR. ROTH: Right. This property was purchased by
19 U LOCK in good faith because the company was reliant on -- and
20 because the company was reliant on Ms. Biros for its funding,
21 when the disputes arose it never had the opportunity to
22 develop.

23 So, we filed a motion to convert from Chapter 7 to
24 Chapter 11. This allows for the Trustee to be in a limited
25 role to assist, but provides a small business entity to be in

1 possession.

2 We believe that as a basis for the constructive trust
3 to Ms. Biros on her unsecured loan was U LOCK's insolvency.
4 Now, we believe that the constructive trusts are voidable under
5 the Pennsylvania constructive trust voidable law and under
6 bankruptcy law. And we believe we have bankruptcy cases which
7 says that constructive trusts can be held to be voidable, and
8 what that does is, makes those people become unsecured
9 creditors that get constructive trust.

10 Our plan would be to invoke those laws and then allow
11 there to be an infusion of \$850,000 to pay off all the
12 creditors in this case. That would pay off Shanni Snyder, and
13 that would pay off Ms. Biros, and give them interest -- all
14 pre-judgment interest on all those items, and if we could have
15 that happen we believe that we could make this a viable
16 concern.

17 We have insurance on the property currently, and in
18 addition to that, we have an individual named John Michael
19 Levesque who is willing to become the president of the entity,
20 and to run this operation.

21 Now, Mr. Levesque is -- has extensive government and
22 business consulting in his history. He was the mayor of a town
23 in Rhode Island, and that town was about the same size as North
24 Huntingdon, which is where U LOCK is located.

25 With regard to the taxes that are owed, we believe

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1 that those taxes will all be cleaned up within 90 days, and we
2 can file a plan within 45 days and initiate the adversary to
3 reverse the 20 -- January '22 judgment, which is giving us the
4 problem here.

5 So, we believe -- and the other thing that will
6 happen then is that the investors in U LOCK would retain about
7 20 percent of U LOCK, but the rest of it would then be
8 distributed to the people who are helping them do all these
9 things.

10 So, we believe that this could be an ongoing and a
11 thriving concern, especially with the help of the individual,
12 and we therefore are asking that the case be transferred.

13 THE COURT: All right. Have you discussed with
14 Trustee Slone any cause of action that you claim might exist on
15 behalf of U LOCK to somehow void the constructive trust?

16 MR. ROTH: Again, I don't believe we have discussed
17 that with him at this point.

18 THE COURT: Is there a reason why you haven't?

19 MR. ROTH: Well, I've had discussions with him, but
20 we never got to the point where we were discussing that
21 particular issue.

22 THE COURT: And you believe that there is case law
23 that would suggest that you can collaterally attack the State
24 Court judgments?

25 MR. ROTH: I believe, yes, we -- I believe we can do

1 that, yes.

2 THE COURT: That does not run afoul of Rooker-Feldman
3 or res judicata?

4 MR. ROTH: I don't believe it does.

5 THE COURT: Explain to me how that would work. What
6 would be the basis to believe that there is an ability to
7 collaterally attack that?

8 MR. ROTH: I couldn't quite hear that question again.

9 THE COURT: What is the legal basis that you rely on
10 to suggest that there still is another method of attack on that
11 constructive trust?

12 MR. ROTH: Well, we believe that the transfer is
13 voidable, okay, and that's what we would intend to pursue is
14 the claimant is voidable.

15 And that occurred on January 22nd, I believe, with an
16 order of court is what created the constructive trust.

17 THE COURT: All right. What about the business
18 itself? Mr. Slone had suggested that at most there was \$2600
19 deposited into the debtor's bank accounts in the first six
20 months of the year.

21 MR. ROTH: Yes, we understand that.

22 THE COURT: Are there any other funds that the debtor
23 has, or is that the sum and substance of the debtor's proceeds?

24 MR. ROTH: Well, we understand that the company has
25 not been making a whole lot of money in the past, and we

1 understand that there are not big dollars there, but with the
2 infusion of \$850,000, which this firm is willing to do to help
3 this company move along, I believe that then it will become a
4 thriving business, especially with the help of Mr. Levesque to
5 help that happen.

6 THE COURT: What kind of thriving business? I mean,
7 are you talking about a self-storage business, or are you
8 talking about development of the property?

9 MR. ROTH: Well, I think part of what they're
10 contending to do is to develop the property in better and more,
11 and better ways than the way it's been developed so far.

12 THE COURT: Okay. But right now there's no --
13 there's no real business there, is there not?

14 MR. ROTH: Just some lockers and things that people
15 store in.

16 THE COURT: Okay. But Mr. -- I mean, do you have any
17 reason to dispute that Mr. Slone said that there's no leases,
18 and so there's no ability to enforce payment against somebody
19 who has items stored there?

20 MR. ROTH: That's my understanding.

21 THE COURT: Okay. And so as a result, \$2,000 in
22 revenue over the course of six months is probably the best this
23 business can hope for?

24 MR. ROTH: Well, that -- so far, until we make
25 further development.

1 THE COURT: Okay. But what I'm trying to understand
2 is what would be the reorganizational purpose of converting
3 this to an 11? It doesn't sound like there's a business there
4 to salvage.

5 So, to the extent that there are a bundle of rights
6 that the debtor has, why should I not just let the Trustee sell
7 those rights, and then either your client or somebody else can
8 buy them and do with them what they want?

9 MR. ROTH: Well, I would suggest this, I'm not sure
10 this quite answers your question, but the property is worth a
11 good bit of money. It's worth a lot more than the \$300,000
12 that was put into it. It's probably worth a couple of million
13 dollars, and we believe if we develop that site, that it could
14 serve to generate a good bit of money.

15 THE COURT: Okay. But if there was an actual claim
16 there to the property and it's viable, why wouldn't the Chapter
17 7 Trustee be in a position to bring that claim on behalf of the
18 estate?

19 MR. ROTH: I'm sorry. I had trouble hearing again.
20 I'm really sorry about that.

21 THE COURT: If there is indeed a viable claim to
22 challenge the constructive trust, why is the Chapter 7 Trustee
23 not equipped to pursue that claim on behalf of the bankruptcy
24 estate?

25 MR. ROTH: Well, they could, but we think that if it

1 was transferred to an 11, then we could reorganize, and we
2 would have much more productive earnings in the future,
3 especially with the help of this gentleman with all the
4 experience with governmental and things.

5 THE COURT: Okay. Anything else at this point on the
6 motion to convert?

7 MR. ROTH: Nothing further.

8 MS. SNYDER: May I say something about the
9 reorganization?

10 THE COURT: Well, again, Ms. Snyder, I don't think
11 you filed anything with respect to the motion to convert. Did
12 you file a response to the motion to convert?

13 MS. SNYDER: It was their motion.

14 THE COURT: Right. So, if you don't file a response,
15 that doesn't give you a ticket to say anything in the court.
16 You got to preserve your right. So, that's what the response
17 is for.

18 All right. Let me hear from the Trustee with respect
19 to the motion to convert. Mr. Slone. Oh, you're on mute.

20 MR. SLONE: Okay. Your Honor, first of all, I don't
21 believe converting will accomplish anything. I don't even
22 think that U LOCK should be in bankruptcy at all. I think the
23 case should be dismissed.

24 However, I had brought up the issue prior of selling
25 the right for any cause of action I might have. If the U LOCK

1 people want to buy it and pursue those claims, that's fine. I
2 don't think I'm going to be -- I don't think we have the
3 ability to overturn the lower court's decision, Your Honor, but
4 I'm willing to sell those rights, and they can pursue that,
5 Your Honor.

6 THE COURT: All right. Nothing --

7 MR. SLONE: And if they have somebody that will fund
8 them for 800 and some thousand dollars, they should have enough
9 money to give a payment to me.

10 THE COURT: All right. Anything else?

11 MR. SLONE: No, sir.

12 THE COURT: All right. Thank you. All right. Let
13 me hear from Ms. Biros with respect to the motion to convert.

14 MS. WENRICH: Thank you, Your Honor. So, my
15 pleadings say most of our argument, but I do want to address a
16 couple of things.

17 First off, with regard to the real property, at the
18 end of the day the real property as it stands is Ms. Biros',
19 and any claim that U LOCK has for a potential successful
20 reorganization relies on that property. There is no lease to
21 be assumed. They have no legal interest in the property.
22 There's just nothing there that would make a reorganization
23 make sense.

24 Additionally, with regard to the constructive trust,
25 it was actually created in 2019. It goes back to the Court of

1 Common Pleas opinion where they said that the property was held
2 in constructive trust for the benefit of Ms. Biros at that
3 point, so it's, you know, January 2022 is just the date that
4 the deeds were released from escrow, but the constructive trust
5 happened way back in 2019.

6 As to the proposed exhibits that were filed by the
7 debtor in support of their motion, there's a big concern with
8 regard to authenticity of some of those documents. We have no
9 one here to testify to authenticate them, and in particular the
10 entity with the alleged funding, the USAAG, done some research,
11 I cannot find any trace of this company in Connecticut, in
12 Pennsylvania, I can't find any evidence of -- I think that one
13 was maybe Dave Carter -- related to USAAG, I just -- I can't
14 find anything. I'd like to think that I'm good at doing
15 research after three years of law school, but I came up empty.

16 And I just think right now there are so many
17 questions based upon items that have been in the pleading and
18 there has been truly utter lack of candor with the Court in
19 many of these pleadings. And I don't think that putting the
20 debtor back in a position where they are running the company
21 will benefit any party in interest.

22 THE COURT: All right. Thank you.

23 All right, Mr. Roth, anything further from you?

24 MR. ROTH: Nothing further.

25 THE COURT: All right. Well, presently before the

1 Court is the U LOCK motion to convert the case from Chapter 7
2 to Chapter 11 relying on Section 706(a) of the Bankruptcy Code.

3 I would note that this is not a mandatory provision.
4 The right to convert is not absolute, and despite that motions
5 under 706(a) are to be granted liberally with the presumption
6 that they are filed in good faith, but that is subject to
7 706(d) which provides that, quote, a case may not be converted
8 to a case under another chapter of this title unless the debtor
9 may be a debtor under such chapter. And that was a provision
10 that the Supreme Court relied upon quite extensively when it
11 rendered its decision in Marrama v. Citizens Bank of
12 Massachusetts, 549 U.S. 365. It's a Supreme Court case from
13 2007, where it found that debtor could not convert from a 7 to
14 a 13 as a matter of right when the debtor was not eligible to
15 be a Chapter 13 debtor due to actions that had occurred
16 previously.

17 So, I do find that the Court has discretion to deny a
18 Section 706(a) motion if there is a showing of bad faith, an
19 illegitimate purpose, or it would not further the best
20 interests of creditors of the estate.

21 And here I look at the record that I have in front of
22 me, I first note the debtor did not timely bring a motion to
23 convert, and the timing is somewhat prejudicial. The
24 involuntary was filed on April 27th, 2022, the initial hearing
25 on Ms. Biros' motion to dismiss was on June 2nd, 2022, and the

1 answer to the involuntary petition was due on June 13th. And
2 in the absence of an answer, I issued an order for relief on
3 June 17th, 2022.

4 This motion to convert was not filed until July 1st,
5 17 days after the answer date, and after a Trustee was already
6 appointed.

7 There's no reason given for this delay and
8 furthermore, I note after looking at the motion to convert and
9 after listening to argument here today, I'm still not getting a
10 real substantive reason given for conversion.

11 This business is admittedly, quote, strapped
12 financially. That's based on Mr. Snyder's testimony in the
13 July 6th hearing, Docket Number 88 at Page 23. And I had no
14 explanation as to how the debtor will reorganize or what funds
15 it will utilize. I have representations of apparently some
16 additional funding that will come in if the debtor is given a
17 chance to reorganize, but as my questioning has alluded to and
18 I think Mr. Slone has also hit upon, it's not clear to me why
19 the debtor if it wished to go down that road could use that
20 funding to acquire assets from this bankruptcy estate through a
21 liquidation sale and then be on its way, and why there would be
22 a need to convert the case to an 11 and go through the cost,
23 expense and delay of doing a plan just to achieve the same
24 result. It would be much more efficient and better for all
25 involved, including creditors of the estate, to keep this in a

1 7 for that basis.

2 It also seems to me based on the discussions here
3 today and at previous hearings that U LOCK's true purpose is to
4 develop the property, not to engage in a self-storage business,
5 which admittedly generates little to nominal value, \$2600 in
6 receipts for the first six months of the year. Statement of
7 financial affairs suggests revenues of no more than \$1,000 a
8 month, and as a result, I'm not convinced that there is a
9 business to reorganize around.

10 The Trustee only has \$2,000 on hand. Certainly not
11 worthy of the expense necessary to do a Chapter 11 and the
12 retention of all professionals that are necessary to get a
13 Chapter 11 case up and running, and that's separate and apart
14 from U.S. Trustee fees that would be accrued on that -- in that
15 case while it's running.

16 Furthermore, I think there are reasons to keep this
17 in a Chapter 7. Admittedly at the last hearing, the debtor
18 indicated there was no insurance in place as of July 6th.
19 There is a representation now in the record that there is
20 insurance. If I accept that as true, I still find that there
21 is acknowledgment that the debtor has never filed tax returns
22 dating back to its formation in at least 2015, which is
23 problematic. And I also have many reasons to believe and to
24 want to have a Trustee in place.

25 The docket here, the docket in the state court, is

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1 replete with contentious litigation. Parties going at it on
2 every conceivable issue, and as a result, it would be helpful
3 to have a Trustee there as a buffer to look out for the best
4 interests of the estate, not necessarily of a particular party.

5 Furthermore, those parties have raised a new issue
6 with me every week and, quite frankly, I don't have a lot of
7 faith in the debtor's ability to self-manage here in the
8 Chapter 11.

9 Assuming that the debtor indeed did get insurance,
10 the debtor did not get that insurance until compelled to do so
11 through questioning in this court. And then I have numerous
12 irregularities with the bankruptcy expectations here. I've got
13 U LOCK commencing an adversary proceeding on behalf of the
14 debtor even though a Trustee has been appointed and before
15 conversion has been granted.

16 I have Shanni Snyder who seems to be acting as an
17 extension of U LOCK, and Ms. Snyder has brought her own claims
18 which seemingly would belong to her bankruptcy estate and
19 seemingly has done so without consulting her Chapter 7 Trustee
20 or seeking approval or the ability to do that on her own.

21 And, finally, I think the cost of a Chapter 11 estate
22 is just not worth the benefit that would be attained by
23 obtained by converting. As I indicated before, my lack of
24 faith in the debtor's management at this point, in fact I think
25 I said this at a prior hearing, if I were to convert the case I

1 was probably going to be inclined to want to appoint a Trustee,
2 and I just don't see the benefit of having a Chapter 11 Trustee
3 and that layer of administrative expense added onto the cost of
4 what's a very modest estate.

5 So, for that reason, I think the case is best served
6 in a 7. There's no business to be compromised while it's in a
7 7 because I'm not convinced that the self-storage business has
8 any great revenue stream and seems to be rather informal as it
9 is. So at best, this is a debtor who has claims, tenuous that
10 they may be to the real property, but that's really the nuts
11 and bolts of what this estate asset is. So, on that basis, I'm
12 going to deny the motion to convert.

13 So, what I want to do now go into is these adversary
14 proceedings and some of the actions of the parties. You know,
15 I've got this adversary that was filed on behalf of U LOCK, and
16 right now -- I thought it was pretty clear at the last hearing
17 that the Trustee stands in the shoes of U LOCK. So, it is only
18 the Trustee who can bring that adversary at this point.

19 So, Mr. Roth, what is the basis for me considering to
20 allow that adversary to proceed at this point given that the
21 Trustee is not the one bringing that action?

22 MR. ROTH: Well, Your Honor, if the Trustee is not
23 going along with it, then I guess we're kind of stuck with it.

24 THE COURT: Well, have you consulted with the Trustee
25 on that?

1 MR. ROTH: Pardon me?

2 THE COURT: Have you consulted with the Trustee about
3 bringing that action? I mean, just so we're clear -- and Mr.
4 Slone's on here. I mean, the allegation is that there was a
5 stay violation by what happened in state court, and if the
6 Trustee is in agreement that there's an action to be brought
7 there, then the Trustee can bring it.

8 So, have you had a conversation with Mr. Slone about
9 that?

10 MR. ROTH: We have not talked about that, Your Honor.

11 THE COURT: All right. Well that's problem number
12 one. You cannot usurp the power of a Trustee and take
13 possession of an estate asset on your own. Do you realize
14 that?

15 MR. ROTH: Yes, Your Honor.

16 THE COURT: That itself is a stay violation. All
17 right, Mr. Slone, are you aware of the allegations in the
18 adversary?

19 MR. SLONE: (No audible response).

20 THE COURT: I didn't -- I don't know if you're on
21 mute again.

22 MR. SLONE: Well, I've read what he wrote and I
23 called Mr. Roth and told him to withdraw it, Your Honor. If --
24 like I said before, if they want to pursue these claims, you
25 know, they can buy them from me. I'm not pursuing these

1 claims, Your Honor.

2 THE COURT: You're not pursuing a stay violation?

3 MR. SLONE: Well, I don't know that there -- in fact
4 there was a stay violation, Your Honor.

5 THE COURT: Well, I don't know, maybe there is a
6 difference of opinion there. I -- based on what I've seen so
7 far, I think this is a curious case where I've got three
8 parties here, and all three of you have violated the stay.

9 I think Ms. Biros may have violated the stay by
10 asking the state court to issue a further court order while the
11 bankruptcy was pending. I think I raised questions about that
12 the very first hearing. I'm not sure what the explanation is
13 for that but yet, you know, again, that's my preliminary
14 observation, I'll give Ms. Biros an opportunity to be heard on
15 that.

16 Mr. Roth, I think you may have violated the stay by
17 taking possession of an asset and trying to pursue a claim on
18 behalf of U LOCK where there is a Chapter 7 Trustee involved.

19 And, Ms. Snyder, I think you did the very same thing.
20 You've got Mr. Zebley, who is the trustee of your personal
21 bankruptcy estate, who reopened the case to administer an
22 asset, and now you are trying to usurp his authority by
23 bringing an adversary action yourself.

24 MS. SNYDER: I believe I have standing because I own
25 portion of it -- a portion of it.

1 THE COURT: You may have an ability to receive
2 proceeds of it, but that doesn't give you the ability to
3 control the asset.

4 MS. SNYDER: Well, I --

5 THE COURT: It is the Trustee's asset to administer.

6 MS. SNYDER: I believed he would -- he would, and I
7 still had --

8 THE COURT: Well, have you had discussion with Mr.
9 Zebley about bringing this adversary case?

10 MS. SNYDER: We e-mailed and I e-mailed Mr. Slone, as
11 well.

12 THE COURT: All right. But did Mr. Zebley say that
13 you could proceed with this adversary on his behalf?

14 MS. SNYDER: I'm not sure.

15 THE COURT: All right. I'll take that as a no. So,
16 what I'm telling you is this --

17 MS. SNYDER: Could we ask --

18 THE COURT: -- I am -- I was very close to
19 considering dismissing this case because based on what Mr.
20 Slone has indicated there is no real value here. Now, perhaps
21 if there is some value to be gained from the sale of the claims
22 or the sale of the residual assets, perhaps there's something
23 to be gained there. But to me, the only benefit of keeping
24 this action open is to adjudicate what I see are perhaps three
25 separate stay violations. This is something I've never seen

1 before where every single party could have violated the stay.

2 MR. OTTO: Pardon me, Your Honor. May I speak?

3 THE COURT: You may.

4 MR. OTTO: Your Honor, I represented Ms. Biros in the
5 state court action. If you look at the Court of Common Pleas
6 docket, what you will find is that the petition for writ of
7 possession and the issuance of the writ of possession were all
8 done prior to --

9 THE COURT: Yes, that's a misapplication of the law.
10 I read what Judge Smail said about that and that's --
11 unfortunately I hate to disagree with a judicial colleague, but
12 once you put something --

13 MR. OTTO: But, Your Honor, may I --

14 THE COURT: -- in order -- just because you started
15 the process doesn't give you the ability to continue the
16 process.

17 MR. OTTO: That's not my point, Your Honor. My point
18 is that the notice of the bankruptcy was not filed until after
19 the writ of possession was issued, and no action was taken on
20 it. It was mailed to me and I held it and did not take any
21 action on it. All of that took place prior to the suggestion
22 of bankruptcy and filed in the state court action.

23 In other words, the -- Judge Smail, who issued the
24 writ of possession, did not have notice of the bankruptcy
25 filing until after that writ of possession was issued.

1 I'm not going to argue whether a stay was committed
2 -- or a violation of the stay was committed, you can look at
3 the calendar and determine that, but it was certainly not a
4 willful violation of the stay.

5 THE COURT: All right. Well, I have to look back and
6 I admit that it's been awhile since I looked at that
7 transcript, but I just recall that there was discussion on the
8 record in that transcript of there being a bankruptcy and what
9 actions the State Court could or could not do in light of that
10 bankruptcy.

11 MR. OTTO: That was a motion that I filed for
12 sanctions against Mr. Roth and Mr. Snyder, not against U LOCK.
13 And the sanctions motion was related to actions that they had
14 both taken during the course of the trial and the appeal, but
15 it was not against U LOCK. In fact, I specifically stated that
16 we were not attempting to take any action against U LOCK
17 because of the stay.

18 THE COURT: All right.

19 MR. OTTO: I'll be happy to provide whatever
20 information --

21 THE COURT: Yes, I will give every party an
22 opportunity to respond to where we are at this point, so. I'm
23 not making any determinations on that today.

24 All right. So, again, you know, I said this the
25 first day, that I felt like this case is the wild, wild west,

1 and now it's been brought into my courtroom, where everyone's
2 just taking unilateral actions, and no one's paying attention
3 to what their obligations are, what their rights are and what
4 abilities they truly have.

5 All right. Let me hear -- let me ask this at this
6 point. At this point, I'm inclined to just outright deny
7 Adversary 22-2048, which is the stay violation brought by
8 U LOCK because it was not pursued by the Chapter 7 Trustee on
9 behalf of the U LOCK estate. So, any reason why I should keep
10 that adversary on my calendar at this point, Mr. Roth?

11 MR. ROTH: No. No, Your Honor.

12 THE COURT: All right. Very well. Then I'm going to
13 deny that adversary, and commensurate with that I will deny the
14 motion to intervene that was filed by Ms. Snyder.

15 Ms. Snyder, I'm inclined to deny your adversary on
16 the basis that you do not control the claim that belongs to
17 your bankruptcy estate, although you may have an interest in
18 the proceeds that the estate garners from that claim. So, is
19 there any reason why I should not dismiss your adversary at
20 this point?

21 MS. SNYDER: Because it was also post-bankruptcy.

22 THE COURT: All right. Because you filed the case
23 after the bankruptcy was closed?

24 MS. SNYDER: Well, the January of 2022 dates were
25 issued, and then the bankruptcy was filed, so my lien is still

1 superior to her's -- to Ms. Biros'.

2 THE COURT: All right. Well, I'm not making any
3 determination on the nature and extent of priority of the lien
4 until I know that you are the one who actually possesses the
5 lien.

6 MS. SNYDER: Okay.

7 THE COURT: And right now I believe that that is an
8 asset of your estate --

9 MR. ZEBLEY: Your Honor, can I speak --

10 THE COURT: -- it wasn't disclosed. All right, Mr.
11 Zebley.

12 MR. ZEBLEY: Here's where we are with Ms. Snyder's
13 case. There's a meeting of creditors on Friday. I think Ms.
14 Snyder has a claim that arose prior to her filing of bankruptcy
15 against U LOCK for work she did for U LOCK, and that work
16 continued after she filed and after the case closed. She
17 obtained a default judgment against U LOCK.

18 In her bankruptcy so far no creditors have filed any
19 claims, and we'll have to see what happens. It's a Chapter 7
20 case. I think the appropriate thing to do myself is to dismiss
21 her case now as premature. She should in her own case file an
22 application for abandonment which would have brought the matter
23 before the Court and she could have asked the Court's
24 permission in her case to appear in the U LOCK case.

25 But that's where we are right now. I have no intent

1 of -- as of today, of filing an action. We'll see after the
2 meeting of creditors if my opinion changes.

3 THE COURT: All right. Ms. Snyder, anything further
4 from you?

5 MS. SNYDER: No, thank you, Your Honor.

6 THE COURT: All right. Well, again, I'm going to
7 deny Adversary 22-2052 as that was commenced without the
8 requisite authority of the Chapter 7 Trustee who has control
9 over that asset at this point.

10 All right. Well, that leaves me with the original
11 motion to dismiss and like I said, potential stay violations
12 involving the remaining parties here, so.

13 Mr. Slone, when do you intend to make a final
14 conclusion as to what you intend to do with respect to the
15 estate assets at this point?

16 MR. SLONE: Your Honor, I will confer with Mr. Roth
17 -- Allen Roth and see if they want to purchase any causes of
18 action. The other assets we either abandon or get a liquidator
19 in there for salvage value. But I wanted to wait to see what
20 happened today, but I will contact Mr. Roth and see if we can
21 proceed there. Otherwise, I'll just -- I can abandon and maybe
22 file this as a no distribution case, Your Honor.

23 THE COURT: All right. You can also discuss whether
24 there is a resolution of any stay violation between the estate
25 and Mr. Roth for commencing the adversary, as well.

1 MR. SLONE: Okay.

2 THE COURT: Related to that, Mr. Zebley, you can have
3 a discussion with Ms. Snyder about any resolution of any stay
4 violation that may have occurred with respect to her
5 commencement of the adversary proceeding. Since that is a
6 Judge Bohm case, that would not be something for me to decide,
7 but it would be something to address in that case, but if the
8 parties can reach a resolution of that, you're welcome to do
9 so.

10 And then last, but not least, I will also deal with
11 and address whether there has been a stay violation with
12 respect to the conduct of Ms. Biros with respect to the state
13 court proceedings and these events which transpired prior to
14 the first motion to -- first hearing on the motion to dismiss
15 after the involuntary was started.

16 But at this point, if the Trustee wishes to broker a
17 sale of assets, he's welcome to do so. If there is an
18 inability to reach a resolution, then I will consider
19 dismissing this case, reserving solely the jurisdiction on any
20 ancillary 362 motions that might need to be addressed for
21 willful violations of the stay.

22 All right. Anything else that the parties wish to
23 address or raise at this point in these proceedings?

24 MS. WENRICH: Your Honor, if I may, I know my motion
25 is pending with regard to relief from stay and abandonment. I

1 understand the way it's been teed up that it likely doesn't
2 make sense. I know you're not inclined to abandon the property
3 at this time, but I do want to make clear that my client would
4 also like the opportunity to purchase any potential claims or
5 assets, as well, and I also just want to put on the record that
6 we reserve all rights if there is litigation commenced against
7 my client that's vexatious, we reserve the right to seek any
8 sanctions necessary.

9 THE COURT: Well, I want everyone to think twice
10 about what they file in this court. You know, we're not
11 shooting from the hip here. There needs to be a sound legal
12 basis for any document that's filed with this court or any
13 request for relief, and you darn well better be sure that you
14 have the ability to bring the action that you proceed with. It
15 does not belong to somebody else or some other estate.

16 With that said, I'm keeping the motion to dismiss
17 open because that is a vehicle upon which I will dismiss the
18 case if I find it reaches that point, but I certainly expect
19 too that if the Trustee is looking to liquidate or sell the
20 remaining assets including any bundle of rights or causes of
21 action that the estate may have, he will entertain offers from
22 all quarters and not necessarily just the parties in this room.
23 And I expect that Trustee Slone with his experience in dealing
24 with these types of estates will do that.

25 So, if there's nothing further then, I'll consider

1 this matter to be concluded. I'm sorry. Is there something
2 else?

3 MS. WENRICH: I'm sorry, Your Honor. One more thing.
4 I -- there was a second notice regarding the compliance with
5 the relief from stay order that Mr. Roth filed on behalf of the
6 debtor.

7 THE COURT: You said a second notice?

8 MS. WENRICH: Yes. I believe it was on August 3rd.

9 No, I'm sorry, Your Honor. It may have just been the
10 declaration regarding additional issues alleging non-
11 compliance. I'm just -- I wasn't sure how you wanted to handle
12 that.

13 THE COURT: No, that looks like that was just a
14 declaration that was filed. I'm viewing that in conjunction
15 with the notice of non-compliance --

16 MS. WENRICH: Okay.

17 THE COURT: -- which I'm deeming to be withdrawn at
18 this point.

19 MS. WENRICH: Okay. Thank you, Your Honor. Sorry
20 about that.

21 MS. SNYDER: Your Honor, may I just say one more
22 thing?

23 THE COURT: Good ahead.

24 MS. SNYDER: So I did believe that in excess of
25 80,000 belonged to me, so my apologies to the Court. I just

1 wanted to file that to preserve my rights to their respect.

2 THE COURT: Well, I understand that but again, I
3 thought we had a clear discussion about this before, that that
4 claim is not in your control at this point. That is a claim
5 that belongs your estate, even if you have rights to a portion
6 of the proceeds.

7 MS. SNYDER: Okay.

8 THE COURT: And so, it's not something that you can
9 just unilaterally proceed with without prejudicing the
10 bankruptcy estate and without getting clearance or guidance
11 from Trustee Zebley.

12 I mean, the two you should be on the same team.

13 MS. SNYDER: Yes.

14 THE COURT: And it's -- that's not something that
15 sits well with me when I see that there is subversive actions
16 being taken to undercut the authority of a Chapter 7 Trustee.

17 MS. SNYDER: Okay. I apologize, Your Honor.

18 THE COURT: All right. Anything further from any of
19 the parties?

20 MR. ROTH: Nothing further.

21 THE COURT: All right. Well, then I expect the
22 parties to straighten up here. I've had enough of this and
23 it's detracting from, you know, resolving this matter and
24 seeing if there's anything here to be liquidated and to
25 preserve -- or to proceed with the expeditious resolution of

1 this estate.

2 So, with that, I'll issue a bundle of orders for the
3 reasons I've stated on the record here today, and then I'll
4 wait to hear from Trustee Slone with respect to his further
5 efforts to liquidate the remaining assets of this estate.

6 With that, we'll consider this matter to be concluded
7 for now. Thank you very much, everyone.

8 ALL ATTORNEYS: Thank you, Your Honor.

9 * * * * *

10

11 C E R T I F I C A T I O N

12 We, COLETTE MEHESKI and CINDY POST, court approved
13 transcribers, certify that the foregoing is a correct
14 transcript from the official electronic sound recording of the
15 proceedings in the above-entitled matter, and to the best of
16 our ability.

17

18 /s/ Colette Meheski

19 COLETTE MEHESKI

20

21 /s/ Cindy Post

22 CINDY POST

23 J&J COURT TRANSCRIBERS, INC. DATE: August 15, 2022

24

25

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: U LOCK INC. a/k/a)	
U-LOCK INC.)	Case. 22-20823-GLT
)	
Debtor.)	
)	

NOTICE OF APPEAL

Part 1: Identify the appellant(s):

1. Name of appellant(s): U Lock Inc.
2. Position of appellant(s) in the adversary proceeding or bankruptcy case that is the subject of this appeal:

For appeals in a bankruptcy case and not in an proceeding: Debtor.

Part 2: Identify the appellees:

1. Name of appellee(s):
 - a. Robert Slone, Trustee
 - b. Christine Biros, Alleged Creditor
 - c. Shanni Snyder, Alleged Creditor

For information regarding each Appellee's counsel, please reference Part 4 below.

Part 3: Identify the subject of this appeal

1. Describe the judgment, order, or decree appealed from: Order Denying Motion to Convert, Entry 110.

TEXT ORDER: On August 9, 2022, a hearing was conducted on the Motion to Convert Case from Chapter 7 to 11 [Dkt. No. 53] ("Motion"). It is hereby ORDERED, ADJUDGED, and DECREED that the Motion is DENIED for the reasons stated on the record. This text-only entry constitutes the Court's order and notice on this matter. Judge Taddonio Signed on 8/10/2022. (jhel) (Entered: 08/10/2022)

As the Order was text only, a copy is not attached but is fully set forth above.

2. State the date on which the judgment, order, or decree was entered: August 10, 2022.

The Order Denying Motion to Convert is a final order, immediately appealable as a matter of right. See *In re MacGibbon*, No. WW-05-1422-PaNK, 2006 WL 6810935, at *11 (9th Cir. B.A.P. Aug. 14, 2006); *In re Sandoval*, 327 B.R. 493, 505 (1st Cir. B.A.P. 2005); see also *United States Trustee v. Sorrells (In re Sorrells)*, 218 B.R. 580, 582 (10th Cir. B.A.P. 1998) (holding that an order is appealable as of right under the collateral order doctrine pursuant to § 158(a)(1)). Further, the Order Denying Motion to Convert conclusively determines a discrete dispute within the larger bankruptcy case and leaves nothing more for that court to do in the case regarding this issue. See *Cascade Energy & Metals Corp. v. Banks* (In re Cascade Energy &

Metals Corp.), 956 F.2d 935, 938-39 (10th Cir. 1992) (ruling that the “appropriate judicial unit for application of these finality requirements in bankruptcy is not the overall case, but rather the . . . discrete controversy pursued within the broader framework cast by the petition”) (citations omitted). There will be no subsequent other final judgment into which this order will merge. See *Bank of New England Corp.*, 218 B.R. 643, 646 (1st Cir. B.A.P. 1998) (citing *Cohen v. Beneficial Indus. Loan Corp.*, 337 U.S. 541, 546 (1949)).

If the United States District Court for the Western District of Pennsylvania determines that the Order Denying Motion to Convert is interlocutory, then pursuant to Federal Rule of Bankruptcy Procedure 8004, the district court should direct appellant U Lock to file such a motion for leave to appeal or construe this Notice of Appeal as a motion for leave to appeal so that the matter can be fully briefed.

Part 4: Identify the other parties to the appeal

List the names of all parties to the judgment, order, or decree appealed from and the names, addresses and telephone numbers of their attorneys (attach additional pages if necessary):

1. Party: Debtor U Lock Inc. represented by J. Allen Roth, Esq.
805 S. Alexandria Street
Latrobe PA 15650
lawmatters@yahoo.com
(724) 537-0939
2. Trustee: Robert Slone, Esq. represented by: Robert Slone, Esq.
223 South Maple Avenue
Greensburg PA 15601
(724) 834-2990
robertslone223@gmail.com
3. Alleged Creditor: Shanni Snyder Shanni Snyder
14390 Route 30
N. Huntingdon PA 15642
shannis@pm.me
4. Alleged Creditor: Christine Biros rep. by: Sarah E. Wenrich
Robert S. Bernstein
rbernstein@bernsteinlaw.com
swenrich@bernsteinlaw.com
601 Grant Street, Floor 9
Pittsburgh, PA 15219
(412) 456-8108

Part 5: Optional election to have appeal heard by District Court (applicable only in certain districts). If a Bankruptcy Appellate Panel is available in this judicial district, the Bankruptcy Appellate Panel will hear this appeal unless, pursuant to 28 U.S.C. § 158(c)(1), a party elects to have the appeal heard by the United States District Court. If an appellant filing this notice wishes to have the appeal heard by the United States District Court, check below. Do not check the box if the appellant wishes the Bankruptcy Appellate Panel to hear the appeal.

() Appellant(s) elect to have the appeal heard by the United States District Court rather than by the Bankruptcy Appellate Panel

Not applicable in this district.

Part 6: Sign Below

Respectfully submitted,

U LOCK INC.

By: /s/ J. Allen Roth, Esq. _____

J. Allen Roth, Esq.
805 S. Alexandria St S
Latrobe PA 15650
(724) 537-0939
lawmatters@yahoo.com

COUNSEL FOR THE DEBTOR

NOTICE OF APPEAL AND STATEMENT OF ELECTION

Part 1: Identify the appellant(s)

- Name(s) of appellant(s):

SHANNI SNYDER
- Position of appellant(s) in the adversary proceeding or bankruptcy case that is the subject of this appeal:

For appeals in a bankruptcy case and not in an
adversary proceeding.

- ☐ Debtor
 ☒ Creditor
 ☐ Trustee
 ☐ Other (describe)

Part 2: Identify the subject of this appeal

- Describe the judgment, order, or decree appealed from: Denial of motion to convert case to Chapter 11
- State the date on which the judgment, order, or decree was entered: August 10, 2022

Part 3: Identify the other parties to the appeal

List the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys (attach additional pages if necessary):

- Party:

U LOCK INC

Attorney:

J Allen Roth, Esq

805 Alexandria Street S

Latrobe PA 15650

724-537-0939
- Party:

CHRISTINE BIROS

Attorney:

Sarah E. Wenrich, Esq.

601 Grant Street, Floor 9

Pittsburgh, PA 15219

(412) 456-8108
- Party :

Biros Irrevocable Life Insurance Trust

unknown attorney
- Party:

Robert Slone, Trustee

Robert Slone, Esq. 223 South Maple Ave

Greensburg PA 15601 (724) 834-2990
- Party:

Charles O Zebley Jr., Trustee

Charles O Zebley Jr., Esq. Box 2124 Uniontown PA 15401

(724) 439-9200

**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	
)	
U LOCK, INC.)	Bankruptcy No. 22-20823-GLT
Debtor)	Chapter 7
*****)	
ROBERT H. SLONE, TRUSTEE)	Document No.
Movant)	
)	
vs.)	
)	
CHRISTINE BIROS, FRED BANKS, DAVID PERLA,)	
DENNY DULL, JOHN DULL, GARY CHERIPKA,)	HEARING DATE: 11/10/22 @ 10:30 a.m.
GLENN MOWRY, INW, JAR COAL COMPANY,)	COURTROOM A—PITTSBURGH
JAMES CLAWSON, JEFFREY SHAW, JENNIFER)	
VERRICO, MARK MYKA, PA TURNPIKE TOLL)	
BY PLATE, PETERS PAINTING, R.J. ABREU,)	
R. WOODALL, RSS, RICOBERTO NEGRETE)	
GALENO. SARA STUMME, SHANNI SNYDER,)	
SHARON McCANCE, SHELLY CHABANDE,)	
BEN SHABANDE, STEPHEN CHAPAS, TERRY)	
NOLL, TONY DAVIS, UNITED STEELWORKERS,)	
WEST PENN POWER, WESTMORELAND COUNTY))	
TAX CLAIM BUREAU, 11585274 CANADA INC. ,)	
USAAG SYSTEMS CO., KASH SNYDER,)	
AND RENEE BASISTA,)	
RESPONDENTS)	

**TRUSTEE’S MOTION FOR SALE OF ALL TANGIBLE
 AND INTANGIBLE PERSONAL PROPERTY OF THE ESTATE**

AND NOW, comes Robert H. Slone, (the “Trustee”), Chapter 7 Trustee in the bankruptcy of U Lock, Inc. (the “Debtor”), and files this *Motion for Sale of all Tangible and Intangible Personal Property of the Estate* (the “Sale Motion”), and in support thereof, states as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Western District of Pennsylvania (the “Court”) has jurisdiction over this Motion pursuant to 28 U.S.C. § 1334. This matter is a core proceeding under 28 U.S.C. § 157(b)(2). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The Statutory predicates for relief requested herein are sections 105 and 363 of Title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the "Bankruptcy Code") and Rules 6004 and 9014 of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules").
3. By this Motion, the Trustee seeks authority from this Court pursuant to Sections 105(a) and 363 of the Bankruptcy Code to sell all tangible and intangible personal Property of the Estate (as defined in §541), and specifically including the Estate's disputed right to the real property located at 14140 U.S. Route 30, North Huntingdon, PA (the "Real Property"), but excluding all cash held by the Estate and the Estate's claims under §546 or §547 of the Bankruptcy Code against George Snyder (the "Purchased Property"). The Purchased Property also includes and assumes the obligations imposed by any regulatory authority or political subdivision to engage in any environmental remediation of the Real Property, without regard to whether the remediation is ultimately determined to be the responsibility of the owner or possessor of the Real Property pursuant to the Estate's disputed claim of possession to the Real Property.
4. On April 27, 2022, Shanni Snyder filed an involuntary bankruptcy petition against the Debtor.
5. The Court set June 13, 2022 as the response date for the Debtor to contest the involuntary petition.
6. The Debtor did not file a response to the involuntary petition.
7. On June 16, 2022, the Court entered an order for relief.
8. On June 22, 2022, the Trustee was appointed as Chapter 7 trustee of the Debtor and its estate.
9. The Trustee received various offers for piecemeal assets of the estate and filed two (2) motions [Doc. Nos. 135 & 137] (the "Initial Sale Motions") in accordance with those offers.
10. On or about September 9, 2022, the Trustee received a better and higher offer, which was amended by correspondence dated September 22, 2022 and September 23, 2022 (the "Offer"), with regard to the same assets set forth in the Initial Sale Motions. A true and correct copy of the Offer is attached hereto as Exhibit "A". As a result of receiving the Offer, the Trustee filed a motion seeking to withdraw or dismiss the Initial Sale Motions [Doc. No. 163].

11. The Estate has been in continuous possession of the Real Property since the Possession Date of April 27, 2022 and, before the involuntary filing of this bankruptcy case, has been in possession of the property since July 2015.
12. The Trustee believes that the Offer and the related structure of the sale contemplated by the Offer will more efficiently maximize the value of the Estate, while also reducing potential significant liability that may have been incurred by the Estate.
13. The Offer was submitted to the Trustee by Christine Biros (the “Proposed Buyer”), and the general terms of the contemplated sale of the Purchased Property are as follows:
 - a. The Proposed Buyer shall file a Verified Disclosure of Connections to these proceedings, and all parties in interest no later than five (5) business days prior to the scheduled Sale Hearing.
 - b. The Purchase Price shall be in the amount of \$31,000.00 in cash plus additional consideration (the “Purchase Price”). The Proposed Buyer shall deposit the Purchase Price (less the \$4,000.00 deposit paid to the Trustee) in good funds with the Trustee within five (5) days of the entry of the Sale Order approving the sale of the Purchased Property to the Proposed Buyer.
 - c. In addition to the Purchase Price, the Proposed Buyer agrees to assume all liability of the Debtor’s Estate for the environmental remediation required on the Real Property, including all remediation required as a result of that certain incident involving a garbage truck which occurred on the Real Property on or about May 27, 2022, and led to the contamination of soil with PCBs, thereby necessitating the decontamination of the Real Property (the “Estate Environmental Liability”).
 - d. With regard to the Estate Environmental Liability, the Proposed Buyer agrees to post a bond or other equivalent financial security in the amount of \$100,000.00 with the Trustee within ten (10) days of the entry of the order approving the Sale to the Proposed Buyer (the “Bond”), which bond shall be held until the Estate Environmental Liability has been fully addressed to the satisfaction of any environmental regulatory entities having

jurisdiction, including the Pennsylvania Department of Environmental Protection. If the Bond has not been released by agreement with the Trustee in 180 days after the date of posting, the Proposed Buyer may seek direction from the Court as to the terms of the Bond's release.

- e. Proposed Buyer, Christine Biros, may have a claim for rent for the use and occupancy of the Real Property since April 27, 2022, and, as additional consideration the Offer includes a waiver of \$10,000.00 of any administrative claim that she may have.
 - f. The Offer includes all claims and causes of action that the estate has with regard to any disputed right to possess the Real Property.
 - g. The Offer includes the Proposed Buyer's agreement to waive any additional claims against the estate related to additional environmental remediation of the Real Property [Claim No. 4].
14. The Trustee proposes to conduct an auction (the "Auction") which seeks to sell the Purchased Property to any bidder with the highest and best offer (the "Purchaser"), with the requirement that each bidder (i) shall submit a deposit of \$4,000.00 to be held by the Trustee (the "Initial Deposit") no later than five (5) days prior to the Auction; (ii) shall agree to post a Bond related to the Estate Environmental Liability within five (5) days of this Court's approval of the Sale of Purchased Property; (iii) shall file a Verified Disclosure of Connections to these proceedings and all parties in interest no later than five (5) days prior to the scheduled hearing in this Sale Motion (the "Sale Hearing"); (iv) shall deposit the Purchase Price with the Trustee within five (5) days of the Court entering an order approving the sale; (v) if the Purchaser is not Christine Biros, shall (a) remove all personal property from the Real Property within 30 days after entry of an order approving the sale; and (b) post an additional bond or other equivalent financial security in the amount of \$25,000.00 within ten (10) days after entry of the order approving the sale (the "Cleanup Bond") to reimburse Christine Biros for the cost of removal and disposal of any tangible personal property which is not removed within 30 days after entry of the order approving the sale; and (vii) by participating in the auction, each bidder agrees to be a backup bidder in the event the Purchaser at the Auction fails to meet the terms of Sale (collectively, the "Bidding

Requirements”). The Trustee proposes that the Sale Hearing take place before this Court, and the Trustee shall provide adequate notice of the sale be set forth with these require to bid and be provided to all parties in interest in a Sale Notice.

15. If the Purchaser of the Purchased Property does not deposit the required Purchase Price (less any Initial Deposit), does not post the Bond, does not post the Cleanup Bond or does not close on the Sale as required in any sale order related to this Sale Motion, then the Trustee requests authorization to immediately close on the Sale of the Purchased Property to the backup bidder, which will be the bidder at the Auction who has the second highest and best offer for the Purchased Property (the “Backup Bidder”).
16. To the extent that the Sale of the Purchased Property to the Purchaser does not close for any reason set forth in the related order, then the Backup Bidder shall purchase the Purchased Property for the amount of the second highest and best offer, less any Excess Deposit¹ (the “Backup Purchase Price”) and any Initial Deposit made by the Backup Bidder. The Backup Bidder shall deposit the required Backup Purchase Price, post the Bond, and close the Sale within five (5) days’ notice from the Trustee that the Purchaser has failed to meet the terms of the related order approving the Sale of the Purchased Property.

RELIEF REQUESTED

17. By this Sale Motion, the Trustee seeks an approval of the Sale of the Purchased Property under and pursuant to Section 363(b) of the Bankruptcy Code, to the Proposed Buyer, or to any other party who has complied with the Bidding Requirements and who has proposed an offer that is better and higher than the Offer (the “Purchaser”).
18. The Proposed Buyer’s offer to purchase the Purchased Property is subject to the presentment of higher and better offers, which comply with the Bidding Requirements, at the Sale Hearing/Auction.

¹ “Excess Deposit” means the amount by which the Purchaser’s Initial Deposit exceeds the difference between the Purchase Price and the Backup Purchase Price. For the avoidance of doubt, if the Initial Deposit of the Purchaser is \$4,000.00, the Purchase Price is \$21,000.00, and the Backup Purchase Price is \$20,000.00, then the Excess Deposit in that scenario would be \$3,000.00.

19. Section 363(b) authorizes the Debtor, after notice and a hearing, to use, sell or lease, other than in the ordinary course of business, property of the estate. 11 U.S.C. §363(b). Section 105 of the Bankruptcy Code provides that the court “may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. §105(a).
20. Although the Bankruptcy Code does not specify the appropriate standard for approving the sale of property under Section 363, courts have uniformly agreed that the business judgment standard applies. See *In re Shubh Hotels Pittsburgh, LLC*, 439 BR 637, 639 (Bankr. W.D. Pa 2010). Courts in the Third Circuit have also held that a court should accept a trustee’s or debtor’s business judgment unless there is evidence of bad faith. See *In re Grand Prix Assocs.*, No. 09-16545 (DHS), 2009 Bankr LEXIS 1779, at 15 (Bankr. DNJ. June 26, 2009).
21. To approve the sale, use of lease of property outside of the ordinary course of business, the Court must find some articulated business justification for the proposed action. See *In re Abbots Dairies of Pa. Inc.*, 788 F.2d 143, 145-47 (3d Cir. 1986).
22. In determining whether a sale satisfies the business judgment standard, courts in the Third Circuit require: (a) that there be sound business judgment reasons for the sale; (b) accurate and reasonable notice of the sale; (c) that the sale yield a fair and reasonable price; and (d) that the parties have acted in good faith. *In re Titusville Country Club*, 128 B.R. 396, 399 (Bankr. W.D. Pa 1991). This Court may additionally grant the relief requested herein under §105(a) of the Bankruptcy Code under equitable common law doctrines, providing, in relevant part, that “the court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. §105(a).
23. The Trustee has the burden to establish that a valid business purpose exists for the use of estate property in a manner that is not in the ordinary course of business. See *In re Lionel Corp.*, 722 F.2d 1063, 1070-71 (2nd Cir. 1983). Once the Trustee has articulated a valid business purpose, however, a presumption arises that the trustee’s decision was made on an informed basis, in good faith, and in the honest belief that the action was in the best interest of the company. See *In re Integrated Resources, Inc.*, 147 B.R. at 656 (S.D.N.Y. 1992).
24. The sale of the Purchased Assets serves a sound business purpose.

25. On or about May 22, 2022, during the time in which the Debtor was in possession of the Real Property, there was a release of contaminants, including PCBs, on the soil of the Real Property which may create an obligation for the Estate to remediate the contamination.
26. By pursuing the sale of the Purchased Assets, the Trustee has maximized the value of the estate by simultaneously bringing money into the estate in the amount of the Purchase Price while also ridding the estate of liability related to the Real Property which may be costly as a result of the contamination of soil with the PCBs that occurred post-petition. If this liability is not addressed in an adequate manner, the estate may be in violation of environmental and statutory regulations with no other means to address the issues.
27. Additionally, the Offer includes a waiver of substantial claims of Christine Biros, some of which would be administrative costs of the estate.
28. As this Court is aware, Ms. Biros asserts that the Estate has no right to occupy the Real Property, as neither the Debtor nor the Estate have the relevant occupancy permits, a lease, or any ownership which would entitle those parties to possess the Real Property.
29. Regardless, the Estate's continued occupation of the Real Property may give rise to a claim of Ms. Biros for reasonable rent of these premises, and she has agreed to waive \$10,000.00 of this claim, and certain other claims, as part of her Offer.
30. Section 363(m) of the Bankruptcy Code provides for the protection to a good faith purchaser of the Purchased Property. Pursuant to Section 363(m):
- The reversal or modification on appeal of an authorization under subsection (b) or (c) of this section of a sale or lease of property does not affect the validity of a sale or lease under such authorization to an entity that purchased or leased such property in good faith, whether or not such entity knew of the pendency of the appeal, unless such authorization and such sale or lease were stayed pending appeal.

11 U.S.C. §363(m).

31. While the Bankruptcy Code does not define “good faith”, the Third Circuit has held that:

[t]he requirement that a Buyer act in good faith...speaks to the integrity of his conduct in the course of the sale proceedings. Typically, the misconduct that would destroy a Buyer’s good faith status at a judicial sale involves fraud, collusion between the Buyer and other bidders or the trustee, or an attempt to take grossly unfair advantage of other bidders.

In re *Abbotts Dairies of Pa. Inc.*, 788 F.2D 143, 147 (3D Cir. 1986).

32. The Trustee seeks a finding with respect to “good faith” of the Buyer, or any other potential buyer of the Purchased Property or the Assets, in furtherance of Section 363(m) of the Bankruptcy Code, which provides an enforceable, safe harbor provision for purchasers of property when the purchase is found to be in “good faith”. The Trustee asserts that the Verified Disclosure of Connections that is part of the Bidding Requirements provides a basis for a finding of good faith pursuant to Section 363(m) of the Bankruptcy Code.

33. This process described in this Motion provides for an open and fair auction of the Purchased Property which will further ensure the arms’ length and good faith nature of this sale by encouraging competitive bidding within the parameters of the Bidding Requirements. As such, the Trustee requests that the ultimate purchaser of the Purchased Property be entitled to the protections of Section 363(m) of the Bankruptcy Code.

WHEREFORE, the Trustee respectfully requests that this Court (i) enter an Order approving the proposed Sale following the Sale Hearing; and (ii) grant such other and further relief as is just and proper.

Respectfully submitted,

Date: September 28, 2022

/s/ ROBERT H. SLONE
Robert H. Slone, Esquire
PA ID No. 19963
MAHADY & MAHADY
223 South Maple Avenue
Greensburg, PA 15601
(724) 834-2990
robertslone223@gmail.com

BERNSTEIN ■ BURKLEY
ATTORNEYS AT LAW

A business approach to legal service SM

Sarah E. Wenrich

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September 22, 2022

Robert Slone
Mahady & Mahady
223 South Maple Avenue
Greensburg, PA 15601

RE: Updated Offer for Purchase of Estate Assets of U Lock Inc.

Dear Mr. Slone:

As you are aware, this firm represents Christine Biros, the owner of the site currently occupied by U Lock, Inc. (the "Debtor") and located at 14140 Route 30, North Huntingdon, PA (the "Real Property"). By correspondence dated September 9, 2022, Christine Biros' counsel, William E. Otto, Esq., conveyed an offer from Christine Biros to purchase all tangible and intangible property of the property of the Debtor's estate. This offer is hereby updated by the terms set forth below (the "Offer"). The four thousand dollar (\$4,000) deposit which you have already received from my client should continued to be held as hand money for the offer as set forth below.

As you are aware, there was an apparent release of contaminants on the soil of the Real Property on or about May 22, 2022 while the Debtor was in possession of the Real Property. We believe this creates an obligation for the Estate to clean up the spill. We have been advised by our engineer that the costs could be in excess of \$200,000. Our offer includes relieving the Estate of that liability.

Ms. Biros also continues to assert that the Estate has no right of possession in the premises. You and Ms. Biros have an understanding that you may continue to use the property during these proceedings, without any agreement to permit possession in the future. Nevertheless, Ms. Biros is willing to offer to buy any rights which the Estate has in the premises.

Christine Biros hereby submits the following offer to purchase all assets of U Lock, Inc., free and clear of any liens or encumbrances. This offers includes, but is not limited to the following property of the estate:

Tangible Personal Property:

- (a) All of the personal property set forth in Official Form 206Sum, Schedule 206A/B, submitted by the Debtor on July 5, 2022 at Doc. No. 59;
- (b) The eight land/sea containers located on the Real Property at the time of the sale of the Real Property by the Schur Estates and located in the northeast corner of the Real Property, adjacent to Lincoln Highway, as shown in the aerial photograph from 2014 attached to the September 9, 2022 correspondence (the "Site Photo"); and

EXHIBIT
A

601 Grant Street • 9th Floor • Pittsburgh, PA 15219

Phone: (412) 456-8100 • Fax (412) 456-8135

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APPENDIX A135

- (c) All of the truck trailers (approximately 23 trailers) shown in various locations in the 2014 Site photo; and
- (d) Any other tangible personal property determined to be owned by the Debtor on or prior to April 27, 2022.

Intangible Personal Property:

- (a) All intangible rights, claims, demands, actions, and causes of action which could be brought or asserted by or on behalf of U Lock for any reason, either as a Debtor in bankruptcy or otherwise, except for the estate's claims pursuant to § 546 or § 547 of the Bankruptcy Code against George Snyder and all cash held by the estate;
- (b) All obligations and liabilities imposed by any regulatory authority or political subdivision to engage in any environmental remediation of the Real Property, whether that remediation is ultimately determined to be the responsibility of the owner or party in possession of the Real Property pursuant to the Estate's disputed claim of possession to the Real Property;
- (c) Any unpaid rent owed to the Debtor or the Estate; and
- (d) All intellectual property of the Debtor.

Terms of the Offer:

The following are the terms of the Offer:

- (a) Cash in the amount of Twenty-Five Thousand Dollars (\$25,000), including the \$4,000 deposit already deposited with the Trustee;
- (b) File a verified disclosure of connections to the bankruptcy case no later than five days prior to the scheduled sale hearing;
- (c) Posting of a bond or other equivalent financial security in the amount of \$100,000 within ten days of the entry of a Court Order approving the sale to Christine Biros;
- (d) Christine Biros shall waive any additional claims against the estate related to required environmental remediation of the Real Property [Claim No. 4];
- (e) Christine Biros shall waive any administrative claims against the Estate for rent for the use and occupancy of the Real Property since April 27, 2022, conservatively estimated to be \$5,000 per month;
- (f) The Sale shall close within ten days of the Bankruptcy Court entering an order approving the contemplated sale; and
- (g) In the event that the successful purchaser is not Christine Biros, the successful purchaser must (i) remove all personal property from the Real Property within 30 days after the order approving the sale is entered, and (ii) must post an additional bond or other financial security in the amount of \$25,000 to reimburse Christine Biros for the cost of removal and disposal of any tangible personal property which is not removed within 30 days of the entry of the sale order.

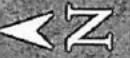
My client is aware that this sale must be completed as an auction sale in the Bankruptcy Court. Please let me know if you have any questions regarding the Offer and if you need any further information in order to move this process forward.

Very truly yours,
BERNSTEIN-BURKLEY, P.C.



Sarah E. Wenrich

SEW/sew



Legend

14140 US-30

Feature 1

Huntingdon Inn

U Lock site 2014

Write a description for your map.

Huntingdon
14140 US 30

Huntingdon Inn

Lincoln Hwy

Iron City Property Maintenance

Shop 724 Barbering Company

oogle Earth

141

APPENDIX A138

mahady@pulsenet.com

From: Sarah E. Wenrich <swenrich@bernsteinlaw.com>
Sent: Friday, September 23, 2022 9:29 AM
To: mahady@pulsenet.com
Cc: Robert S. Bernstein; William Otto
Subject: ULock - Modified Offer from Christine Biros

Hi Bob,

I'm writing to follow up on the offer made by Christine Biros yesterday. She has modified her offer as follows:

- The cash payment of \$25,000 is increased to \$31,000; and
- She no longer completely waives her entitlement to an administrative claim, valued at approximately \$20,000. Instead, she waives only the initial \$10,000 of her administrative claim at this time. To illustrate, if she is entitled to \$30,000 of an administrative claim as of the date of the closing of the sale, then she agrees to waive \$10,000 of that claim and only assert an administrative claim in the amount of \$20,000.

Let me know if you have any questions or concerns.

Thank you!
Sarah

Sarah E. Wenrich, Esq.

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"A"